

SRS-01

Frequently Asked Questions (FAQ)



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SRS-01

Frequently Asked Questions (FAQ)

Approved by Head of SSG R.Pias

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CHANGES LOG

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1. Introduction

Leonardo Helicopters published in December 2022 the SRS-01 document and relevant Modules to introduce Safety Requirements for Suppliers:

- SRS-01 Safety Requirements for Suppliers Issue 0 – Main Document
- SRS-100 Safety Requirements for Suppliers with SMS
- SRS-101 Safety Requirements for Suppliers with no SMS
- SRS-102 Safety Requirements for Suppliers providing services at LH premises

The documents are uploaded in the Leonardo Helicopters Portal in the Suppliers section.

Additional documents to support SRS-101/102 implementation are available at the Additional Data sub-section to provide information about tools and principles.

The purpose of this overview is to summarize Frequently Asked Questions (FAQ), so far received from internal and external sources in order to provide; one a better understanding on which of the above documents is applicable and the Leonardo Helicopters approach to Safety and to the Supply Chain.

This overview will be reviewed regularly to provide an updated status of the questions received and their corresponding answers.

2. Definitions

EU European Union

LH Leonardo Helicopters

LGS Leonardo Global Services

QRS Quality Requirements for Suppliers

SMS Safety Management System

SQA Supplier Quality Assurance

SPI Safety Performance Indicators

SRU Safety Related Units

SRS Safety Requirements for Suppliers

UAS Unmanned Air Systems



3. Questions

3.1 Implementation of an SMS in approved/certified organizations

3.1.1 Why should I implement an SMS in my company?

The European Union (EU) published the following new Regulations in the aeronautical sector aimed at improving flight safety:

- a) COMMISSION IMPLEMENTING REGULATION (EU) 2021/1963 of 8 November 2021 amending Regulation (EU) No 1321/2014 as regards safety management systems in maintenance organizations and correcting that Regulation
- b) COMMISSION DELEGATED REGULATION (EU) 2022/201 of 10 December 2021 amending Regulation (EU) No 748/2012 as regards management systems and occurrence-reporting systems to be established by design and production organizations, as well as procedures applied by the Agency, and correcting that Regulation
- c) COMMISSION IMPLEMENTING REGULATION (EU) 2022/203 of 14 February 2022 amending Regulation (EU) No 748/2012 as regards management systems and occurrence-reporting systems to be established by competent authorities, and correcting Regulation (EU) No 748/2012 as regards the issuance of airworthiness review certificates

Such new regulations mandate that, in pursuant to Annex 19 'Safety Management' of the Convention on International Civil Aviation, signed in Chicago on 7 December 1944 (the 'Chicago Convention'), competent authorities require approved organizations to implement a safety management system within the specific deadlines. Approved organizations are those that design, produce, and maintain civil aircraft, helicopters, as well as engines, propellers and parts to be installed therein.

3.1.2 Regarding the new European Regulations, which are the deadlines for implementing an SMS in my company?

The relevant deadlines are as follows:

- Regulation (EU) 2021/1963 amending Regulation (EU) No 1321/2014 came into force on 2 December 2022. There is a transition period allowing the maintenance organization to correct any findings of non-compliances with the new Part-145 requirements until 02 December 2024.



- Regulations (EU) 2022/201 and 2022/203 amending Regulation (EU) No 748/2012 come into force on 7 March 2023. There is a transition period allowing design and production organizations to correct any findings of non-compliances with the new Part-21 requirements until 7 March 2025.

3.1.3 What is an SMS?

The SMS is a management system developed to maintain and improve flight safety through the identification of hazards, the collection and analysis of safety data / information and the continuous assessment of safety risks. The SMS seeks to pro-actively mitigate safety risks before they result in aviation accidents and incidents.

3.1.4 How is an SMS structured?

ICAO Annex 19 Appendix 2 provides the SMS framework, which comprises four components and twelve elements as follows:

- 1) Safety policy and objectives
 1. Management commitment.
 2. Safety accountability and responsibilities.
 3. Appointment of key safety personnel.
 4. Coordination of emergency response planning.
 5. SMS documentation.
 - 2) Safety risk management
 1. Hazard identification.
 2. Safety risk assessment and mitigation.
 - 3) Safety assurance
 1. Safety performance monitoring and measurement.
 2. The management of change
 3. Continuous improvement of the SMS.
 - 4) Safety promotion
 1. Training and education.
 2. Safety communication
- Note 2) Interface Management

3.1.5 How is LH proceeding in the implementation of the SMS in its organization?



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LH is one of the world's leading helicopters manufacturers, which designs, manufactures and supports rotorcrafts for various Civil and Military Customers to the maximum Safety level.

LH has a strong commitment to be “the safest rotorcraft manufacturer and organization in the world”.

Safety is a fundamental factor that allows LH to maintain its competitiveness in the global market and, in accordance with the EU regulations, LH has implemented the latest Safety requirements, introducing the Safety Management System (SMS) in each internal certified organization.

From Suppliers, LH is expecting a commitment to collaborate with its SMS organizations, thus ensuring to ensure a high contribution to Aviation Safety.

Furthermore, the new EU Regulations require that, regardless of the approval status of the subcontracted organizations, the production organization (PO) is responsible for ensuring that hazard identification and risk management activities are performed on subcontracted activities.

Therefore, with the aim of maintaining and improving Safety in the Supply Chain, LH has recently published a set of new Safety Requirements for Suppliers (SRS), derived from the ICAO framework. These requirements are in addition to and complement to the current Quality Requirements for Suppliers (QRS).

3.1.6 How will these new SRS be applied to the Supply Chain?

The SRS-01 document and the relevant submodules are applicable to all the LH Suppliers, where the Suppliers are undertaking design, manufacturing or maintenance responsibilities/activities in accordance with a LH Contract/Purchase Order and/or any other associated documentation.

LH has identified three different categories of Suppliers for which the Safety requirements are applicable in accordance with the contents of its associated SRS module. Each Supplier will be required to fulfil the relevant requirements in accordance with one of these categories.

Suppliers providing Products and/or Services for LH UAS applications are excluded from the implementation of LH Safety Requirements until further notice.

3.1.7 How will LH manage the new SRS and in which way will these affect the Supply Chain?

All Suppliers must be approved to supply Products.



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The SRS-01 document Issue 0 and associated modules are effective immediately for newly approved Suppliers and applicable from December 2nd 2022 for Part 145 certified Suppliers and from March 7th, 2023 for Part 21 certified Suppliers. A transition period of 2 years will be allowed to complete the implementation, at the end of which the Findings must be closed. These deadlines are in accordance with the EU Regulations.

The new Suppliers will need to follow the Leonardo supplier qualification process, that will include also Safety Requirements, at the end of which the Supplier will be approved and receive a formal Statement of Approval signed by the Head of LH Quality System.

Currently approved Suppliers will be required by LH to comply with the new Safety Requirements through the revised qualification process on Safety aspects and the surveillance process performed by the LH SQA team.

To clarify, current approvals will not be withdrawn, however, the matter will be reviewed in 2025, after the two years transition period.

3.2 Applicability of SRS-01 and submodules

3.2.1 What are the three different categories and the relevant SRS submodules?

The categories and applicable SRS modules are:

- SRS-100: Suppliers with SMS

This SRS module is applicable to all the LH Suppliers undertaking design, manufacturing or maintenance responsibilities and activities or both as:

- Approved organizations (holding an organization approval, e.g., DAO, DOA, ODA, POA, AMO/MOA)
- Other organizations (holding a certificate for design or manufacturing or both, e.g., TC, PC, PMA holder), including those from the supply chain (i.e. critical system and component suppliers).

ICAO Annex 19 prescribes that each State must require organizations under its authority to implement an SMS.

This module provides a set of SMS requirements consistent with the ICAO framework that shall be implemented by the Supplier in its own organization(s) to support LH SMS organizations.

- SRS-101: Suppliers with no SMS



This SRS module is applicable to all the Suppliers providing Products and Services to LH who have neither an approved organization (e.g., DAO, DOA, ODA, POA, AMO/MOA) nor are certificate holders (e.g., TC, PC, PMA holders), and work under the scope of approval of an LH subcontracting organization.

LH requires these Suppliers to implement a set of Safety rules and tasks in order to support the LH approved organizations and related SMS. In this context, these Suppliers will act as Safety Related Units (SRU) of the LH SMS.

In accordance, this SRS module provides a minimum set of Safety requirements that should be implemented by the Supplier and their own organizations to support LH SMS.

- SRS-102: Suppliers providing services at LH premises

This SRS module is applicable to all Suppliers providing Services to LH who have neither an approved (e.g., DAO, DOA, ODA, POA, AMO/MOA) nor a certificate holding organization (e.g., TC, PC, PMA holder), and work at LH premises under the scope of approval of an LH subcontracting organization.

LH requires these Suppliers to implement a set of Safety rules and tasks in order to support the LH approved organizations and related SMS. In this context, these Suppliers will act as Safety Related Units (SRU) of the LH SMS.

In accordance, this SRS module provides a minimum set of Safety requirements that should be implemented by the Supplier and their own organizations to support LH SMS.

3.2.2 I am a LH approved supplier and I have a certification XYZ from the authority ABC, which document is applicable to my company?

The applicable document is SRS-100: Supplier with SMS.

3.2.3 Which transition period is applicable for the SRS-100 qualification?

The deadlines for the SRS-100 qualification are in accordance with the EU Regulations already mentioned at Q 3.1.2.

- Regulation (EU) 2021/1963 amending Regulation (EU) No 1321/2014 became applicable on 2 December 2022. In addition, there is a transition period allowing the maintenance organization to correct any findings of non-compliances with the new Part-145 requirements until 02 December 2024.



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- Regulations (EU) 2022/201 and 2022/203 amending Regulation (EU) No 748/2012 becomes applicable on 7 March 2023. In addition, there is a transition period allowing design and production organizations to correct any findings of non-compliances with the new Part-21 requirements until 7 March 2025.

3.2.4 I am a LH approved supplier, based in US (CAN, etc...), and I do not have an EU certification, why should I follow these LH Safety requirements?

The new EU Regulations mandate that, in pursuant to Annex 19 ‘Safety Management’ of the Convention on International Civil Aviation, signed in Chicago on 7 December 1944 (the ‘Chicago Convention’), competent authorities require approved organizations to implement a safety management system within the specific deadlines.

This is not a European requirement. ICAO Annex 19 prescribes that each State must require organizations under its authority to implement an SMS (e.g., organizations responsible for the type design or manufacture of aircraft, engines or propellers in accordance with Annex 8, approved maintenance organizations providing services to operators of airplanes or helicopters engaged in international commercial air transport, in accordance with Annex 6, Part I or Part III, Section II, respectively).

National Aviation Authorities will continue to promulgate SMS regulations applicable to organizations identified in ICAO Annex 19 and these organizations will be required to comply consistent with their State’s requirements.

As a matter of fact, the FAA has already a program in place for voluntary application with the aerospace industries. The National Aerospace Standard NAS-9927 and SM-0001 International Industries Standard are recognized by the FAA as a mean of compliance because they meet the intent of ICAO Annex 19 and 14 CFR Part 5 for SMS implementation. In addition, the FAA published at the beginning of January 2023, a Notice of Proposed Rulemaking (NPRM), for an initial consultation period of two months, and in future will issue the final publication.

Meanwhile, it is understood by the industries that other authorities, like TCCA, ANAC, UK CCA, will issue their own regulations in the future accordingly.

LH Safety Requirements are based upon the ICAO Annex 19 framework and do not add further requirements to what is already requested by ICAO and authorities.

Regarding the proposed FAA NPRM, there are slightly different deadlines (e.g. March 7th 2025 for SRS-01 and December 27th 2025 and content (e.g. Part 145 application). However LH believes that a prompt and earlier implementation of the SRS requirements could be beneficial for its helicopters and tiltrotors safety, so LH has decided to bring forward these requirements for the whole supply chain, thus maintaining alignment and consistency with the EU requirements and related time schedule.



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3.2.5 I am a LH approved supplier, but I do not have a certification from the authority, which document is applicable to my company?

The applicable document is SRS-101: Supplier with no SMS. At the moment, the document is structured for a voluntary application by the Supplier.

A Supplier that notifies LH Procurement of their voluntary application to will be required to follow the new Safety Requirements through the revised qualification process and the surveillance process performed by the LH SQA team.

To clarify, current approval will not be withdrawn, however, the matter will be reviewed in 2025, after the two years transition period.

3.2.6 Which is the transition period applicable for the SRS-101 qualification?

LH proposes a voluntary implementation of safety requirements through a two phase approach (Basic and Advanced) with a suggested two years implementation period in line with the requirements of the certified suppliers, see Q 3.2.3.

3.2.7 When does LH expect a Supplier to be at Phase 1 (Basic) and 2 (Advanced)?

There is no specific timeline for Phase 1 or 2., the LH recommendation is to complete this process in the two years period. The split of activities between Phase 1 and 2 has been created to make it easier for companies not yet acquainted with Safety, to progress smoothly in the implementation. However, a company could decide to proceed directly to Phase 2.

3.2.8 Why are these SRS requirements not mandatory for the whole supply chain?

First of all, LH considers the certification of Suppliers at the highest levels as an important factor for the achievement of Safety objectives.

In fact, the absence of such certifications represents additional workload, responsibilities, and consequently cost for LH since Suppliers with no certification will need to work under the scope of approval of an LH certified organization. LH will therefore consider this aspect as a maximum priority in the selection of Suppliers and regulate the frequency of its Surveillance activity based also on the certification status held by Suppliers.



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Secondly, LH Supply Chain is huge, thousands of suppliers and the majority of these Suppliers do not have certifications. Whilst full coverage would have allowed a better implementation of safety in products and helicopters, the cost and management of the whole Supply Chain within a period of a couple of years would have presented many challenges to the LH organization.

The selected approach is a compromise and provides a framework of process and procedures that includes a mandatory requirement for suppliers with certification and a voluntary application for others suppliers without certifications. The four documents listed above may be helpful for Suppliers not accustomed to Safety concepts and provide useful knowledge on which LH and the Suppliers can base the next steps of their relationship.

3.2.9 My Company does not have certifications, why should I proceed with the implementation of such SRS requirements?

From Suppliers, LH is expecting a commitment to collaborate with its SMS organizations, thus ensuring a high contribution to Aviation Safety. The voluntary approach by Suppliers is a way to disseminate and promote safety as a common value.

Furthermore, LH is working today with thousands of Suppliers and is currently monitoring the whole Supply Chain through Key Performance Indicators (KPI). In the coming months, Leonardo Helicopters will engage Key Suppliers to improve the current contractual agreements based on supplier characteristics and performance on airworthiness and safety issues.

3.2.10 Our company is a distributor, not a manufacturer nor a repair station. Can we get confirmation of our “exempt” status?

No, because every Supplier dealing with documentation, handling products, delivering services, etc. is an important part of the process and should be involved in Safety.

Just as an example, recently LH has been involved in safety issues related to the preparation and availability of kits of standard parts. Such kits are prepared, managed, and delivered directly to the helicopters assembly line by a distributor providing a service to LH.

Therefore, the applicable document in such a case is SRS-101: Supplier with no SMS. See also Q 3.2.5.



3.2.11 I am a Service Provider working at LH premises and LH approved supplier, and I do not have a certification, which document is applicable to my company?

The applicable document is SRS-102: Service Providers working at LH premises. At the moment, the document is structured for a voluntary application by the Supplier.

A Supplier that notifies LH (LGS) Procurement / stakeholder of their voluntary application will be required to follow the new Safety Requirements through the surveillance process performed by the LH stakeholders. No LH SQA qualification process is required for such Suppliers.

In the coming months, Leonardo Helicopters will engage Key Suppliers to improve the current contractual agreements based on supplier characteristics and performance on airworthiness and safety issues.

3.2.12 Which transition period is applicable for the SRS-102 implementation?

LH proposes a voluntary implementation of safety requirements through a two phase approach (Basic and Advanced) with a suggested two years implementation period in line with the requirements of the certified suppliers, see Q 3.2.3, Q 3.2.6 and Q 3.2.7.

3.3 SRS Exemptions

3.3.1 My company provides parts (or services) for the AWHero at the Pisa plant. Can LH confirm we are exempt from these safety requirements?

Yes, in accordance with European Regulations, Suppliers providing Products and/or Services for LH UAS applications are excluded from the implementation of LH Safety Requirements until further notice.

3.3.2 My company provide parts (or services) for military programs to Leonardo UK Ltd at the Yeovil plant. Can LH confirm we are exempt from these safety requirements?



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Suppliers providing Products and/or Services for military programs to Leonardo UK Ltd are excluded from the implementation of LH Safety Requirements. Although UK MAA has issued its own Regulation RA 1200 - Air Safety Management, the SRS requirements are related only to civil aviation.

The same is applicable also to Suppliers providing parts any LH plant under military certifications that do not require the SMS implementation.

3.4 SRS Contents

3.4.1 In Section 5 (Reference Documentation) there are 18 documents. Do I need to read all of them to use the SRS?

The documents are listed for reference and supplementary general knowledge. The SRS documents and supporting documentation on Leonardo Helicopters Portal in the Supplier section already include all the relevant narratives and requirements for Suppliers consideration.

The only recommendation for further reading would be Document 4) SMS SM-0001 International Industry Standard, Revision B dated 31 March 2022. This document, created with the contribution of major industries and industry associations, provides a very comprehensive guide for the SMS implementation. It is available via the following link:

<https://www.asd-europe.org/news-publications/standards>

3.4.2 Paragraph 8.1.2 Safety Accountability and Responsibilities. Is my Company responsible for activities performed by a sub-tier supplier, even if we have used LH approved 2nd Tier Suppliers with D.Q.P. accreditation ?

Yes. First of all, the Supplier must engage with qualified sub-tier Suppliers.

Secondly, the Supplier is overall responsible for flow-down of the requirements to sub-tier Suppliers and for surveying their activities as contractually requested.

Regarding the specific paragraph, this is from ICAO SMM Doc 9859 and refers to the responsibility of managing suppliers in safety related issued. LH is in the same position as any other Company on this topic which is why we are engaging Suppliers with the SRS documentation.

Moreover, the focus is not on the utilization of approved or not-approved sub-tier Suppliers, but on the relationship established with them (e.g. contractually), their surveillance, and in the prompt exchange of hazards and risks data.



3.4.3 Paragraph 8.2.1.1 Hazard Identification. Our Company produces forgings for LH and we are unfamiliar with the LH manufacturing processes. How do we know if the identified hazards will impact subsequent operations or final product(s)?

LH expect the Suppliers to identify hazards /risks in their area of operation and share this information with LH if they believe it could impact the product and safety operation of the aircraft. A joint analysis of the issue by LH and the Supplier will determine if the hazard is real, the relevant impact and which mitigation and recovery action(s) the Parties need to undertake..

However, the flow of information queries, both up and down, along single or even multiple-tier supplier arrangements needs to be properly controlled. SMS deals with the inner workings of each organization and it is not necessary or useful to propagate all hazards and risk analyses across interfaces if they do not affect the other organization. In order to avoid “unnecessary interference” it is sufficient to know that any risk is assessed and controlled by the other organization. In accordance, the Supplier shall independently manage hazards and associated risks, if these are not affecting LH and the satisfactory operation of the product, the helicopter or both.

For Hazard Identification, please also see the SRS-101/102 supporting documentation on the Leonardo Portal, in the Supplier section, under the heading Safety Risk Management (SRM) Principles & Tools:

- Appendix 1 to SRM Principles & Tools Best Practices for Hazard Identification
- Appendix 2 to SRM Principles & Tools Hazard List - Generic and Function Specific

3.4.4 Safety and Just Culture values and principles. Our Company is already certified BS OHSAS 18001/ISO 45001 and ISO 14001 and safety culture is already documented and internal training is ongoing (extended also to suppliers). Is the current system acceptable?

The different aspects on which LH will evaluate acceptability of what has been implemented in the Supplier organization are based on the following:

- The Supplier is required to share the same values and principles and define its own Safety Policy and Objectives, consistent with those of LH, signed by the Supplier Accountable Executive and communicated with visible endorsement throughout the organization.



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- The Suppliers should implement Safety and Just Culture values and principles in its own organization and establish a voluntary reporting system to collect hazards data and improve safety.
- The Supplier should analyze and manage these communications within its own organization providing feedback to the originator of the voluntary reporting.

For clarity, Suppliers with no certified organizations work under the scope of approval of an LH subcontracting organization. In this context, these Suppliers will act as Safety Related Units (SRU) of the LH SMS.

The LH Safety Policy and Safety and Just Culture principles are included in the SRS-101/102 documentation and visible on the Leonardo Portal in the Suppliers section.

3.4.5 Why is important to keep recording and collecting data of the safety issues data?

Acquiring and recording safety data is a key input to check the level of safety achievement versus objectives and to continuously improve the level of safety in the organization.

Data acquisition can rely on already implemented means, such as the data gathering system used for Continued Airworthiness when mandated by the applicable regulations, or the monitoring of the internal organization operations for failure, malfunctions, defects, and quality escapes that could result in unacceptable aviation safety risk. Or, externally: the data acquisition process includes data collected in the monitoring of external stakeholders such as customers, suppliers (and relevant sub-tiers) and with authorities.

Data can be quantitative, used to identify and provide a clearer picture of the 'area' being measured, and qualitative, data sources such as employee safety reports and in-depth causal analyses in accident reports are generally qualitative.

Data Analysis is valuable for hazard identification. Data Analysis of potential precursors, near misses and weak signals, may lead to the identification of safety issues/hazards, which need to be risk assessed to determine what actions, if any, are needed. The whole process ensures that any necessary safety action is identified. Data analysis complement the Continued Airworthiness activities with a proactive Safety Risk Management approach to enhance the product safety beyond continued airworthiness duties.

3.5 SRS Training

3.5.1 Does LH plan any training on SRS for the Supply Chain?



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Firstly, SMS courses are available from many providers and agencies on the market. Suppliers with certification can take advantage of these experienced providers for their own implementation.

In fact, LH used some of these providers for internal training for its workforce during the implementation of the SMS.

Secondly, in the past LH implemented an e-Learning Platform for QRS-01 material and enrolled Suppliers' employees for the training modules. Accordingly, LH will also implement Safety/SRS-01 material in the e-Learning platform during 2023, so to train key personnel from the Suppliers organization.

Lastly, for service providers working at LH premises, LH will extend its own internal in-person courses to the supplier representatives, when needed.





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