Introduction to Safety Management System (SMS)

Flight Standards and Industry Roles

Presented By: Flight Standards Service





Agenda

•Overview

•Safety Fundamentals & Case for SMS

SMS Fundamentals - Overview

- Policy Component
- •Safety Risk Management Component
- Safety Assurance Component
- Safety Promotion Component

•Standards, Tools and Implementation





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Overview



What SMS is not and what it is...

What it isn't:

A substitute for compliance

A substitute for oversight

A replacement for system safety

A requirement for a new department

What it is:

Compliance is integral to safety management

An effective interface for safety management

SMS completes the systems approach

A set of decision making processes for senior and line management



What is safety?

- Freedom from harm (Dictionary def'n.)
- Safety is not equivalent to risk free (U.S. Supreme Court, 1980)
- "Risk management" is a more practical term than "safety." (Jerome Lederer ~1928)
- Carelessness and overconfidence are more dangerous than deliberately accepted risk (Wilbur Wright, 1901)
- Practical safety is <u>risk management</u>



Definition of Safety

"Safety is the state in which the risk of harm to persons or property is reduced to, and maintained at or below, an acceptable level through a continuing process of hazard identification and risk management"

ICAO Doc 9859



Safety Management Systems



A systemic approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures.

ICAO Doc. 9859



SMS Purpose and Methods

- Safety management systems provide a systematic way to control risk and to provide assurance that those risk controls are effective
- The SMS gives the certificate holder a formal means of meeting statutory safety requirements (title 49) and the FAA a means of evaluating management capability



System Safety

- "The application of special technical and managerial skills in a systematic, forward looking manner to identify and control hazards throughout the life cycle of a project, program, or activity" (Roland & Moriarty, 1990)
- Traditional approach concentrates on technical
- SMS <u>adds</u> emphasis on management elements



SMS, ATOS and QMS

Does SMS = ATOS?

- SMS
 - Management system
 - Only service provider can manage
- ATOS
 - Oversight system
 - Used to meet regulator responsibilities

Does SMS = QMS?

- Same principles but different objectives
- QMS Objective
 - Customer satisfaction
- SMS Objective
 - Aviation safety



ICAO Annex 6

- "From 1 January, 2009, States shall require, as part of their safety programme, that an operator implement a safety management system acceptable to the State of the Operator..."
- The U.S. has filed a difference with ICAO
- Currently, there are no FAA authorized procedures to accept of approve Service Providers' SMS's





ICAO: State's "safety programme"

Definition:



- An integrated set of regulations and activities aimed at improving safety.
- Includes SMS requirements for aviation service providers
- The AVSSMS is the U.S. safety program
 - FAA Oversight
 - Regulations, Standards & Policy
 - Assurance (ex; Certification, Surveillance, etc.)
 - Service Provider SMS Requirements







Clarifying the "3 R's":







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Safety Fundamentals & Case for SMS



What is the Fundamental Objective of a Business Organization?

To achieve its production objectives!



The Business Case

- Aviation organization management requires managing many business processes.
- Safety management is a core business function just as financial management, HR management, etc.
- This constitutes a management challenge.



Protection and Production

- Safety Requirements
 - Title 49 USC...44702 "...the duty of an air carrier to provide service at the highest level of safety in the public interest"
- Economic Requirements
 - [Proposed operation must be] "...consistent with public convenience and necessity"
 - [Company must be] "...fit, willing and able to provide the service proposed"



Safety Management System

- Infuses safety into all parts of the system
 - People
 - Tools
 - Procedures
 - Materials
 - Equipment
 - Software



To maintain the balance of production and protection



Accidents and Incidents Cost!

Direct costs

- Loss of aircraft
- Injuries to or death of flight crewmembers, passengers
- Insurance deductibles
- Costs not covered by insurance

Indirect costs

- Loss of use of equipment
- Loss of staff
 - Involved in accident issues
 - Lower productivity
- Investigation & clean-up
- Legal claims
- Fines
- Misplaced/stranded
 passengers
- Negative media exposure



Income lost

Event	Direct	Indirect
Catering truck hits airplane	\$17,000	\$230,000
Jetway hits airplane	\$50,000	\$600,000
Landing event	\$1,900,000	\$4,800,000
	Ramp Damage Has Big Price Tag For Airlines	
	Parts prices only Cargo Door \$58,327 Main Entry Door \$171,220 Badome \$19,712	Outboard Flap Assembly S255,845 Inboard Flap Assembly \$224,872 L.E. Stat Assembly \$52,863
Source: USAir/America West Airlines	AOA Vane \$4,300 Pitot Static Pro \$5,157	Probe Side cowl \$161,407 be Inlet Cowl \$329,203 inlet Cowl Segment \$5,151



The Evolution of Safety Thinking



Administration

Traditional approach – Preventing accidents

- Focus on outcomes (causes)
- Unsafe acts by operational personnel
- Attach blame/punish for failures to "perform safely"
- Address identified safety concern exclusively

Identifies:





Human Error and Operations

- Human error: a contributing factor in most aviation occurrences.
- Even competent personnel commit errors.
- Errors are a normal component of any system where humans and technology interact.





Types of Errors (Active Failures)

Perception Errors

- "I didn't see it," or "I didn't notice the difference..."

Memory Lapses

- "I forgot to do it..."

Slips

- "I didn't mean to do that..."

- Wrong Assumption
 - "I assumed that the situation was different..."

Alan Hobbs, ATSB (2008)



Errors (cont.)

Technical Misunderstandings

 – "I tried to do it right but I didn't understand what I had to do…"

- Procedure Violations
 - "Nobody follows that procedure here...."
 - "We can't get the job done if we do all that..."

Alan Hobbs, ATSB (2008)











Safety Management Strategies

Reactive	Proactive	Predictive
(Past)	(Present)	(Future)
Responds to events that have already happened, such as incidents and accidents	Actively seeks the identification of hazardous conditions through the analysis of the organization's processes	Analyzes system processes and environment to identify potential future problems





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SMS Fundamentals



SMS Concepts

- Applying Risk Management
- Assuring Safety Risk Controls
- Oversight of Design and Performance of Systems
 - Design Assurance
 - Using Assessment tools
 - Performance Assurance
 - Using Assessment tools





SMS Concepts: Risk Management

- Understanding the system and environment
- Identifying hazardous conditions
- Assessing risk
- Applying risk controls





SMS Concepts: Assurance

- Assurance: "something that gives confidence"¹
- Quality assurance: "... focused on providing confidence that quality requirements are being met"²
- Likewise, Safety Assurance relates to safety requirements



¹ Black's Law Dictionary ² ISO 9000-2000



SMS Components ("Pillars")







1. Policy

- All management systems must define policies, procedures, and organizational structures to accomplish their goals.
- Policy establishes the structure of the SMS.





2. Safety Risk Management.

 A formal system of hazard identification, analysis and risk management is essential in controlling risk to acceptable levels.




- 3. Safety Assurance.
- Once controls are identified, the SMS must assure they are continuously practiced and continue to be effective in a changing environment.





 The organization must promote safety as a core value with practices that support a positive safety culture.



Safety Risk Management (SRM) and Safety Assurance (SA) Workflow



Oversight and SMS





2 Service Provider/Organizational Level

³ Individual (Airman/Aircraft) Level



Roles, Responsibilities & Relationships





Safety Management System

Provides a systematic way to:

- 1. Identify hazards and control risk
- 2. Provide assurance that risk controls are effective









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SMS Details:

Policy Component



SMS Policy

- Establishes management commitment and objectives – what the management wants
- Sets up framework of organizational structures, accountabilities, plans, procedures, and controls to meet objectives



Management Responsibility

- Managers should manage safety in the same way that they manage other areas of the business
- Safety management involves judgment, assessing priorities, and making decisions – like all management decision making





Top Management Involvement

Top management stimulates a healthy safety environment

- Visible, personal involvement of top management
- Setting safety goals and objectives as policy
- Allocation of resources to meet safety goals
- Clear communication

AC 120-92, App. 1



Objectives of the Policy Component

Top Management will:

- Implement an integrated, comprehensive SMS for entire organization
- Define a safety policy and set safety objectives
- Define roles, responsibilities, and authorities throughout the organization
- Appoint a member of management to implement and maintain the SMS



Policy: Other Responsibilities

Emergency response

 Develop and implement procedures to respond to accidents and incidents



Control of Documents and Records:

- Have a clearly defined document maintenance process
- Implement and maintain a safety management plan



Safety Policy Requirements:

- Commitment to:
 - Implement an SMS
 - Continually improve safety
 - Manage safety risk



- Comply with statutory & regulatory requirements
- Establish clear standards of acceptable behavior
- Documented
- Communicated
- Periodically reviewed



Organizational Structure

- Top management with ultimate authority and responsibility
- Top management requirement to provide resources
- Defined lines of supervision and control
- Defined safety responsibilities for all employees
- Designated management official to ensure effectiveness of SMS (e.g. DOS)



Accountability Defined

Accountability = Obligation or willingness to account for one's actions

A SMS shall clearly define lines of safety accountability throughout the *provider* organization, including direct accountability for safety on the part of senior management.

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Accountability vs. Liability

- SMS promotes an environment that stimulates open reporting
- This includes and active involvement of all personnel, starting with top management in safety problem-solving
- Barring negligence or deliberate disregard for safety, SMS does not promote blame for error



Management Functions

- Managers must be *actively* and *personally* involved in:
- Planning: Setting clear goals, guidelines, standards, and timelines for safety
- Organizing: Providing clear lines of management and supervisory responsibility, control and communication
- Directing: Allocation of resources needed for accomplishment of safety goals
- Controlling: Personal involvement in assurance of safety goals and objectives



System Attributes

Processes must have safety requirements built into their design.

- a) **Responsibility**: accountable for quality of activities
- b) Authority: power to accomplish required activities
- c) **Procedures:** clear instructions for members of the organization
- d) **Controls**: supervisory controls on processes to ensure activities produce the correct outputs



System Attributes

In addition, there are process measures and interfaces.

- e) Process Measures: measurement of both processes & their products
- f) Interfaces: Recognizing interrelationships between individuals and organizations within the company as well as with contractors, vendors, customers, and other organizations



System Attributes in Management

- The six attributes are the essence of management:
 - Planning: Procedures



- Organizing: Procedures, Responsibilities & Interfaces
- Directing: Responsibilities & Authority
- Controlling: Process Measures & Controls
- Now also documented in the ICAO SMM



SMS Documentation

- System documentation conveys management expectations and work instructions to employees
- May be a stand-alone manual or integrated into existing documentation systems





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SMS Details:

Data Quality



Decision Making: Data, Analysis, and Assessment

- Reports (Facts): what exists or is happening now
- Inferences (Interpretations)
 - What's likely to happen in the future, based on what's happening now
 - Conclusions based on facts
- Judgments: value, quality assessments (e.g. good, bad, acceptable, unacceptable) of what is or will exist or happen



Example:

• Facts (Conditions):

- Duty day is 14 hours
- Flight schedule is 8 hours
- Flights have 10 legs, 10 IFR approaches
- Flights are legal (within regs.)
- Inference (Hazard):
 - Crew fatigue will probably result
- Inference (Risk analysis):
 - Likelihood of crew errors will increase
- Judgment (Risk Assessment):
 - Unacceptable risk



Attributes of Data and Measures

Validity:

- Does the data/measure address the subject desired?
- Does it only address the subject desired?
- How completely does it cover the subject desired?

Reliability:

- Are data points about the same thing comparable?
- Are data points collected by different observers comparable?

Data and measures must be reliable to be valid but reliable data is not always valid

Training and careful preparation of tools can increase reliability of data



SMS Details:

Safety Risk Management Component



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Definitions

Safety management systems provide a systematic way to control risk and to provide assurance that those risk controls are effective.

Safety Risk Management is a formal system of hazard identification, analysis and risk management essential in controlling risk to acceptable levels.



System/Task Analysis (Design)

What is System & Task Analysis?

- It is a system design function.
- It is a predictive method of hazard identification.
- It is the foundation for sound safety analysis.

When is it used?

- Used during implementation phases of SMS.
- Used in conjunction with all operational changes.

Who uses System & Task Analysis?:

- Personnel within the organization who form an appropriately diverse team:
 - Stakeholders
 - Subject Matter Experts





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SRM

System & Task Analysis





Typical Workplace Conditions

- Equipment: Human-Machine Interface, Facilities
- Operators: Individual performance
- Crew/team performance
- Organizational culture
- Company/regulator factors

Strauch, Barry (2004). Investigating Human Error



Process (System) Attributes

- Responsibility
- Authority
- Procedures
- Controls
- Process
 Measures
- Interfaces





Conditions Related to Error

- Time pressure
- Procedures and documentation
- Teamwork/documentation
- Shift turnovers/crew briefings
- Group norms
- Fatigue management (shifts/circadian problems)
 Alan Hobbs, ATSB (2008)



Conditions Related to Error (cont.)

- Lack of System Knowledge
- Equipment/facilities
- Human-machine interface (e.g. design for maintainability)



Activities and Conditions: Deicing

Activities/Tasks and Actors What and Who	Workplace Conditions System and Environment
Select type of fluid	Day/Night
(Check holdover time)	Precipitation/cold
Position at Aircraft	Employee demographics
Communicate with crew	
Apply Fluid	
Depart Ramp Area	


Hazard Identification

A hazard is any real or potential *condition*...

that can result in *injury*, *illness*, or *death* to people; *damage* to, or loss of, a system (hardware or software), equipment, or property; and/or damage to the operating environment.

System Analysis (Design) Hazard Identification Risk Analysis Risk Assmt Risk Control



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SRM

Hazard Identification from Workplace Conditions



WSTR.

Risk Analysis

- Important to distinguish between:
 - Hazard a condition
 - Consequence result
 - Risk likelihood & severity of the consequence



 Analyzing risk involves the consideration of both the likelihood and the severity of any adverse consequences.

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SRM

From Hazard to Risk



SL-77

Failures and Consequences

Active failures Direct results of conditions	Potential Consequences (e.g. accident/incident severity)
Incorrect Fluid Type	Take-off accidents due to ice
Hold-over time too long	
Incomplete deicing	



Risk Analysis

Risk is the composite of the predicted likelihood or probability and the severity of each possible consequence of each identified hazard.



Adapted from ICAO Doc. 9859



Risk Assessment

Control

Risk assessment determines the level of risk to use in making a bottom line decision.



A risk matrix is a tool used for risk assessment. It can vary in form yet it accomplishes the same purpose.



Risk Control = Risk Mitigation

A major component of any safety system is the defenses (controls) put in place to protect people, property or the environment.

These defenses are used to reduce the **likelihood** or **severity** of the consequences associated with any given hazard or condition.



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SRM

Risk Control/Mitigation



Risk Control Order of Precedence:

- 1. Modify the system (design hazard out)
- 2. Physical guards or barriers
- 3. Warnings or alert signal
- 4. Administrative controls
 - Procedures
 - Training





Regulations as Risk Controls

Rulemaking (FAA SRM)

- Identified Hazard in the Aviation System
- Risk Control: Regulation = limits of <u>acceptability</u>

Compliance (Operator's SRM)

- Operator's Program Design = Risk <u>Acceptance</u> (still must comply with regulatory requirements)
- Design Assurance (FAA) Certification functions





Continuing Operational Safety (COS)

- Risk controls must be continually monitored to ensure their viability. This is accomplished through Continuing Operational Safety (COS)
- COS = Ongoing compliance through:
 Safety Assurance (Operator)
 Performance Assurance Surveillance (FAA)



SMS Details:

Safety Assurance Component



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SMS Concepts: Assurance

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 ² ISO 9000-2000



SM Strategies – Intervention Levels & Tools





Safety Assurance Functions:

- Collect and analyze information to determine that process requirements are continuously being met.
- Assess performance and effectiveness of risk controls.
- Works in partnership with Risk
 Management.







System Operation

Written documentation to describe:

- Who, What, When, Where, Why, How
 - The system operation includes:



- 1) Monitoring of risk controls during operations;
- System description, including risk controls added during SRM which form the basis for SA functions such as audits and analysis.

AC 120-92



Data Acquisition & Process

Information Sources

- 1. Continuous Monitoring
- 2. Internal Audits
- 3. Internal Evaluation
- 4. External Audits
- 5. Investigations
- 6. Employee Reporting Systems





AC 120-92



Continuous Monitoring

Where SRM and SA interface - risk controls

Line managers of operational departments:

- Accomplish continuous monitoring of day-to-day activities & processes
- Have direct responsibility for process control
- Must ensure that processes in their areas function as designed.







Continuous Monitoring - Operational Data Sources

- Flight dispatch records
- Flight schedules
- Financial data
- Crew schedules and records
- Warranty return reports
- Aircraft discrepancy reports
- Flight cancellation and delay reports







Internal Audits

The day-to-day responsibility for safety management rests with those who "own" the technical processes.

This is where:

deficiencies in processes contribute to risk



- audits provide feedback to process owners
- direct supervisory control and resource allocation can help to maintain effectiveness of risk controls



System Operation

Data Acquisition

& Process

Analysis

System Assmt

Preventive/

Corrective Action

Internal Evaluation

- Performed by a functionally independent person or organization (e.g. QA, Safety)
- A process-oriented control function
- Backs up the internal audit function
- Uses sampling to validate SA processes





External Audits

Conducted by:

- Code-share partners
- Industry organizations (e.g. C.A.S.E.)
- Third parties: consultants
- The regulator (FAA) = "Safety Oversight"





Safety investigations

- For continuity put the event behind us
 - To put losses behind
 - To reassert trust and faith in the system
 - To resume normal activities
 - To fulfil political purposes
- For improved system reliability
 - To learn about system vulnerability
 - To develop strategies for change
 - To prioritize investment of resources



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System

Operation

Data Acquisition & Process

Analysis

System Assmt

Employee Reporting

- Employee safety reporting & feedback system is required.
- Must provide confidentiality.
- Employees must be encouraged to use the system.
- Data may identify emerging hazards.
- Data must be included in analysis.





System Operation

Data Acquisition

& Process

Analysis

System Assmt

Preventive/ Corrective Action

AC 120-92, App. 1



Analysis

- To be useful, information must be made understandable.
- Analysis is used to determine effectiveness of:
 - 1. Risk controls in the organization's operational processes, and
 - 2. the SMS.



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System Assessment

- Are objectives being met? ("Happy loop")
- Risk controls failing due to:
 - Lack of supervision
 - Lack of resources
 - Lack of training
 - Poor job aids
- New Hazard/failed Risk Controls (redesign - back to SRM)
- Prioritize according to safety criticality (triage)







Preventive/Corrective Actions

- Revised policies
- New procedures
- Equipment changes
- Enhanced training
- Schedule changes
- Assignment of responsible persons









Management Review

Top management will conduct regular reviews of the SMS, including:

- The outputs of SRM & SA
- Lessons learned
- Need for changes





Continuous Improvement

The organization shall continuously improve the effectiveness of the SMS through:

- Safety and Quality Policies
- Safety Objectives
- Audit & Evaluations
- Analysis of Data
- Corrective and Preventive Actions
- Management Reviews



SMS Details:

Safety Promotion Component



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Promotion: Definition

Safety promotion = a combination of:

- Safety Culture,
- Training and
- Knowledge Sharing

activities that support the implementation and operation of SMS in an organization



Organizations must promote safety as a core value with practices that support a positive safety culture. AC 120-92, App. 1





Informed: People understand the hazards & risks

- Learning: The company learns from mistakes. Staff are updated on safety issues by management.
- Just: Employees know what is acceptable & unacceptable behavior.

Reporting: All personnel freely share critical safety information.

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To Support a Sound Safety Culture:

- 1. Senior management commitment
- 2. Senior management visibility
- 3. Safety accountability framework
- 4. Safety policy, goals, objectives, standards, and performance
- 5. Effective employee safety reporting system
- 6. Safety information system
- 7. Resource commitment



Training and Communication!

- Employees must understand the SMS
- Employees benefit from safety lessons learned
- Explain why particular actions are taken
- Develop awareness of hazards
- Foster open reporting of safety concerns
- Initial and ongoing training





Personnel Competencies and SMS Training

- Identification of competency requirements
- Selection and hiring criteria and standards
- Training
- Skill competency
 - Initial training
 - Recurrent training
 - Continuous communication


ISD Processes SMS Processes





Commitment to SMS

•Documents alone will not guarantee development of a positive safety culture.



•Employees must see evidence of management commitment to SMS.



Management Attitudes & Actions = the most important factor.

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SMS Guidance, Tools and Implementation





- ICAO Doc 9859: Safety Management Manual (SMM)
- FAA Order 8000.369: FAA SMS Guidance
- VS 8000.367: AVS Requirements Document
- SMS Standard: AC 120-92 Appendix 1
- Voluntary Implementation Guidance



ICAO and FAA SMS Framework



/ _		
(Elements:	
	1 1 Safety Policy	
(Elements:	a
	4.1 Competencies and Training	
	Process 4.1.1 Personnel requirements	
	Process 4.1.2 Training	
	4.2 Communication and Awareness	\mathbf{F}
3	2 Management of Change	
2	3 Continual Improvement	

















SMS Implementation

- Should follow a Phased Approach
- The processes underlying the four components will be modularized
- "Growth" or "increasing maturity" will then be emphasized for each process and the system as a whole





SMS Voluntary Implementation: Pilot Projects

- Pilot Project activities commenced in 2007
- Voluntary SMS development
- AFS combined effort
- Objectives are to Develop:
 - Implementation strategies,
 - Oversight interfaces, and
 - Gain experience for FAA and Service Providers



SMS Implementation Process





SMS Transition Assistance Team (STAT)

- Provides Standardization and Assistance to operators and CMT's in voluntary SMS projects
- Under direction of AFS SMS Program Office (PO)
 - Team members currently from:
 - SMS PO
 - FAASTeam
 - HQ Policy Divisions





 All activities coordinated with appropriate certificate oversight offices



13

Safety Management System Focus Group (SMSFG)

Voluntary implementation user's group

- Provides a two-way communications mechanism between SMS PO and participants in voluntary implementation
- Provides a forum for knowledge sharing among participants



SMS Studies and Analysis





Organizations





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Summary



Safety Management System

Provides a systematic way to:

- 1. Identify hazards and control risk
- 2. Provide assurance that risk controls are effective







Roles, Responsibilities & Relationships





Safety Management System Provides

- 1. Increased Safety
- 2. International Harmonization
- 3. Improved Organizational Effectiveness



"Carelessness and overconfidence are more dangerous than deliberately accepted risk" Wilbur Wright, 1901

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Wilbur Wright gliding, 1901 Photographs: Library of Congress



