

SMS Certification for Chief Executives

Some companies become certificated in Safety Management Systems with seemingly little trouble. What do the CEs of those companies have in common?

A robust safety management system should flow through an entire operation in a positive way, influencing the safety-linked behaviour and values of each employee.

But it is the attitude of just one person – the chief executive – who largely drives whether the actual *process* of becoming SMS certificated is filled with hooks and hiccups, or is smooth and straightforward.

And it's apparent to the CAA that the companies which have become SMS certificated on their first attempt have chief executives who share a similar approach.

"They're already trying to build as strong a safety culture as possible," says Adrian Duncan, a CAA safety management systems technical specialist. "They have this goal of their business operating smoothly and safely, and their bottom line untroubled by the potential expense of having to deal with an accident.

"Then, before they do anything else, they've come to a thorough understanding of what SMS is all about. They've read AC100-1, researched credible sources on the internet, and consulted other operators. They've checked out the CAA's sector risk profiles, and they've attended a CAA safety management system workshop.

"None of this stuff is rocket science. They've taken the time to learn the fundamentals, and they've led the organisation through the introduction of their SMS.

"In learning those basics," Adrian says, "the CEs have realised that SMS is not just Quality Assurance. Nor is it occupational health and safety at the exclusion of operational safety. Organisations that typically fail in SMS have put all their energy into ensuring their workplace is safe, but haven't given due consideration to the management of their operational risks, which is the primary purpose of an SMS.

"And a safety management system is not just documentation either. The key word here is 'system'. There are 13 elements to an SMS, and 'the manual' is just one of those. Those CEs recognised that 'producing a manual' on its own and submitting it to the CAA wouldn't make much of a difference to safety, and therefore wouldn't be enough to meet SMS certification requirements."

British safety management systems specialist, Neil Richardson, who led a Wellington

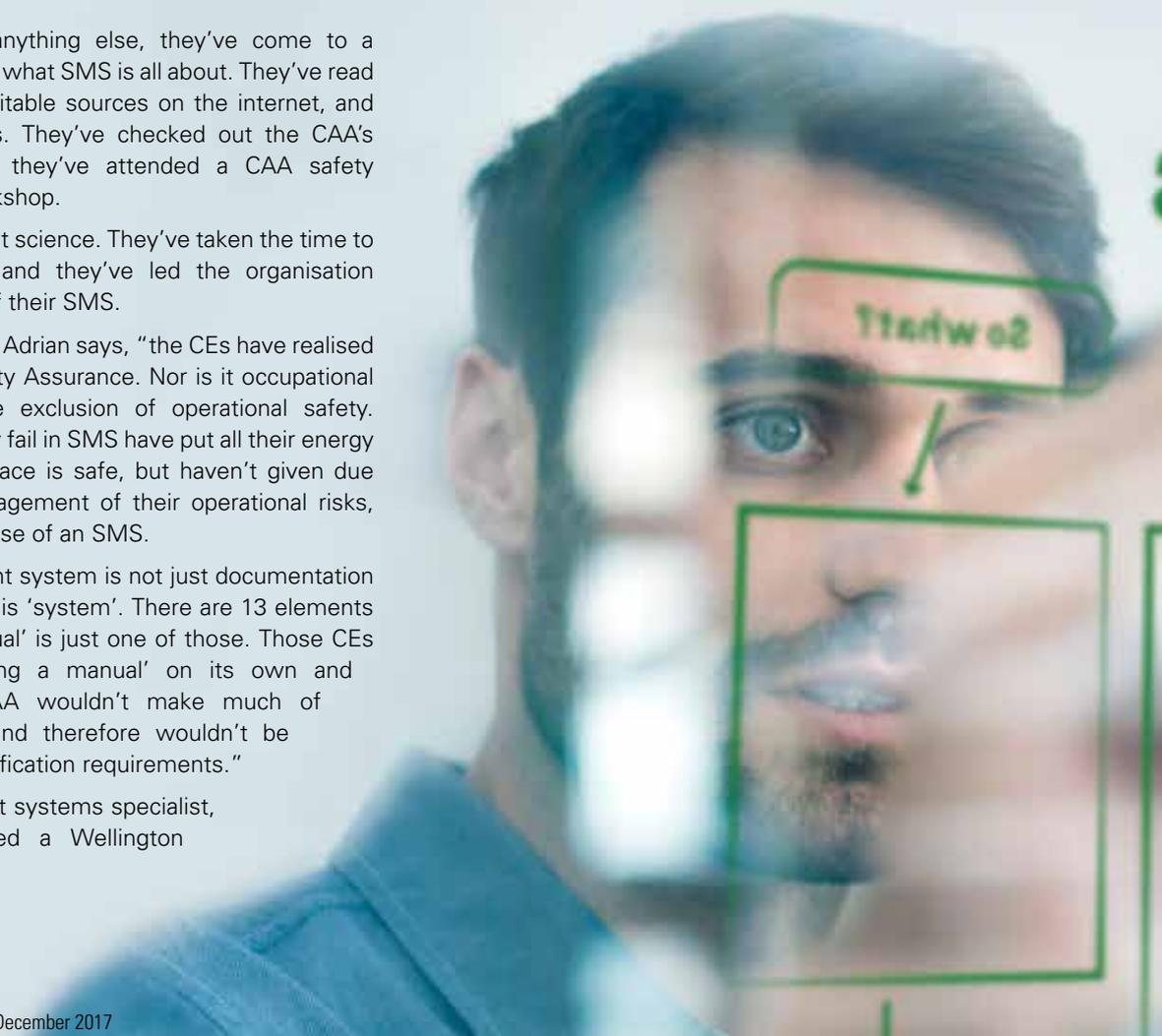
workshop for CEOs in April 2017, agrees SMS is more than just paperwork.

"The reality of 'doing safety' must extend beyond the manual, matrices and risk registers, and play out in the decision making and behaviour of people throughout the organisation on an hour-by-hour basis.

"Safety is fundamentally behavioural."

Only when those CEs fully understood what SMS was, why it's a requirement of ICAO, and what it meant for their business, in both obligations and benefits, did they begin to put something concrete in place.

"That first task," says Don McCracken, CEO of Oceania Aviation, "is to appoint a good safety officer who understands what SMS is, what it entails, and why it's beneficial to the organisation.



"Then the leadership needs to support the safety manager's decisions as they put risk reduction systems in place, and provide them with the resources to do that."

Adrian Duncan says that the CAA has no problem with chief executives getting in external consultants to assist in the design of an organisation's SMS. But, he says, some of those organisations fail in their first attempt to become SMS certificated, because the consultant has used almost a generic 'template', which proves to be a poor fit for that particular operation.

"CEs who've hired a consultant and said to them 'build me an SMS, don't take up my time with it, just get it done and into the CAA' were disappointed when their application invariably failed."

"The chief executives who got the most out of their consultant's fees worked closely with that person to make sure that what they came up with made sense to the CE, and would work well for their operation. This is the concept of 'scalability', where the system corresponds to the size of the organisation, the nature and complexity of the activities the organisation undertakes, and the hazards and associated risks inherent to those activities."

Neil Richardson agrees that each SMS should be tailored for individual operations.

"Keep it pragmatic," he says. "Make it work for you."

A constant refrain from those who've become certificated is that preparing for SMS implementation is more straightforward than it first looks.

Don McCracken admits that the hardest part was "slowly coming to the realisation of how simple it could be".

"Some people with practical intelligence might regard the SMS concept as obscure and difficult to put into place. But in fact, they are already practising safe behaviour to a high level every day. SMS is really just about formalising that practice."

Neil Richardson agrees about keeping it simple.

"SMS can be surrounded by mystery and clouded by jargon, but once you grasp its intent of reducing and controlling safety risks, it makes perfect sense."

But what does all that mean in a practical sense?

"Tool box meetings," says Don McCracken. "Daily updates on projects can identify opportunities for improvement and possible future risk."

"Everyone should be involved in reviewing existing known hazards, identifying new ones, and trying to imagine the future to determine what may be up ahead."

"Writing down any possible outcomes, preparing for the unknown event, creating a Plan B, and mitigating what can be mitigated."

That sort of commitment by every employee is led and modelled by the chief executive, not just to achieve certification, but also because there are benefits to SMS other than those surrounding safety.

"It gives CEs a really clear understanding of the way their business works," says Adrian, "and where the holes are. Weaknesses that maybe, weren't obvious before SMS, suddenly became apparent, and can then be addressed."

"Creating and sustaining the sort of culture that makes SMS part of daily business takes leadership," says Neil Richardson.

"But if fully embraced, the wider business benefits of 'being safe' can be realised through improved harm protection."

"Who wouldn't want that?"

The Director of Civil Aviation, Graeme Harris, regards the introduction of SMS as a potential solution to the very poor safety performance, in international terms, of elements of commercial general aviation in New Zealand.

"For many years, the prescriptive civil aviation safety regulatory system applied around the world has lagged behind the more demanding performance-based approach taken in the occupational health and safety field in many countries."

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"The ICAO mandate for the introduction of SMS recognises the need for a significant improvement in safety performance.

"That means a move from minimum standards in the form of civil aviation rules, to what is close to a 'best practice' standard required to manage risks to an 'all reasonably practicable steps' standard."

Graeme notes that assessing what is 'reasonably practicable' must be done in the context of international practice – not simply what is done in New Zealand.

"I see safety management systems as offering the opportunity to improve GA's relatively poor safety performance. I encourage operators to engage early with the CAA during the SMS certification process and to take every opportunity to learn from their colleagues who are already certificated.

"Those colleagues will be able to provide valuable advice on how best to develop the robust risk reduction strategies needed for SMS certification."

Some Tips

'Group 2' participants should be working on and submitting their implementation plans now. The cut-off date for getting those plans into the CAA is 30 July 2018.

There's a wealth of information on the internet, and particularly on the Skybrary – Safety Management International Collaboration Group – site, which puts out plenty of readable material, good for organisations of all sizes.

Check out the Sector Risk Profile of Parts 135 and 137 at www.caa.govt.nz, "Aviation Info > Safety Info > Safety Reports". Compare what the profile says about risk with what your organisation is already doing about that risk.

If you decide to get in a consultant, ask around first. Who did other, successfully certificated, organisations use?

The CAA web site has a range of resources to help with SMS implementation. Go to www.caa.govt.nz/sms.

There's also good material at www.zeroharm.org.nz/ and at www.deloitte.com/nz/healthandsafety/.

If you want to email the CAA's SMS team, it's sms@caa.govt.nz.

Applications need to be with the CAA no later than 60 days **prior** to the organisation's implementation date (refer AC100-1). The application needs to include:

- » An appropriate certificate-type application form, eg, 24119/01, 24137/01
- » Amended exposition/SMS manual and associated matrices
- » Completed form 24100/02 Evaluation Tool
- » Senior Person FPP application(s).

Part of assessing whether an organisation has sufficiently robust risk reduction strategies to become SMS certificated includes an onsite visit by the CAA. That includes an interview with the nominated safety manager, the chief executive, and discussions with staff at all levels.

The CAA team will test that the 'elements' of the SMS are in place and are suitable for the organisation, but what's also important are discussions with people throughout the organisation. The team will be testing their understanding of that organisation's SMS, and their involvement in it. It's finding out about the culture and the leadership, and the buy-in of every employee. ■

