



Dr Michelle Millar

# FRMS Approval and Oversight



# FRMS Guidance Manuals



- FRMS Guidance
  - Operators
  - Regulators



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## Regulatory Decisions, Activities and Tools

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FRMS SARPs and their intent.

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### Chapter 6.

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## Supporting Information

### Appendix A.

Glossary

### Appendix B.

Tools for measuring fatigue

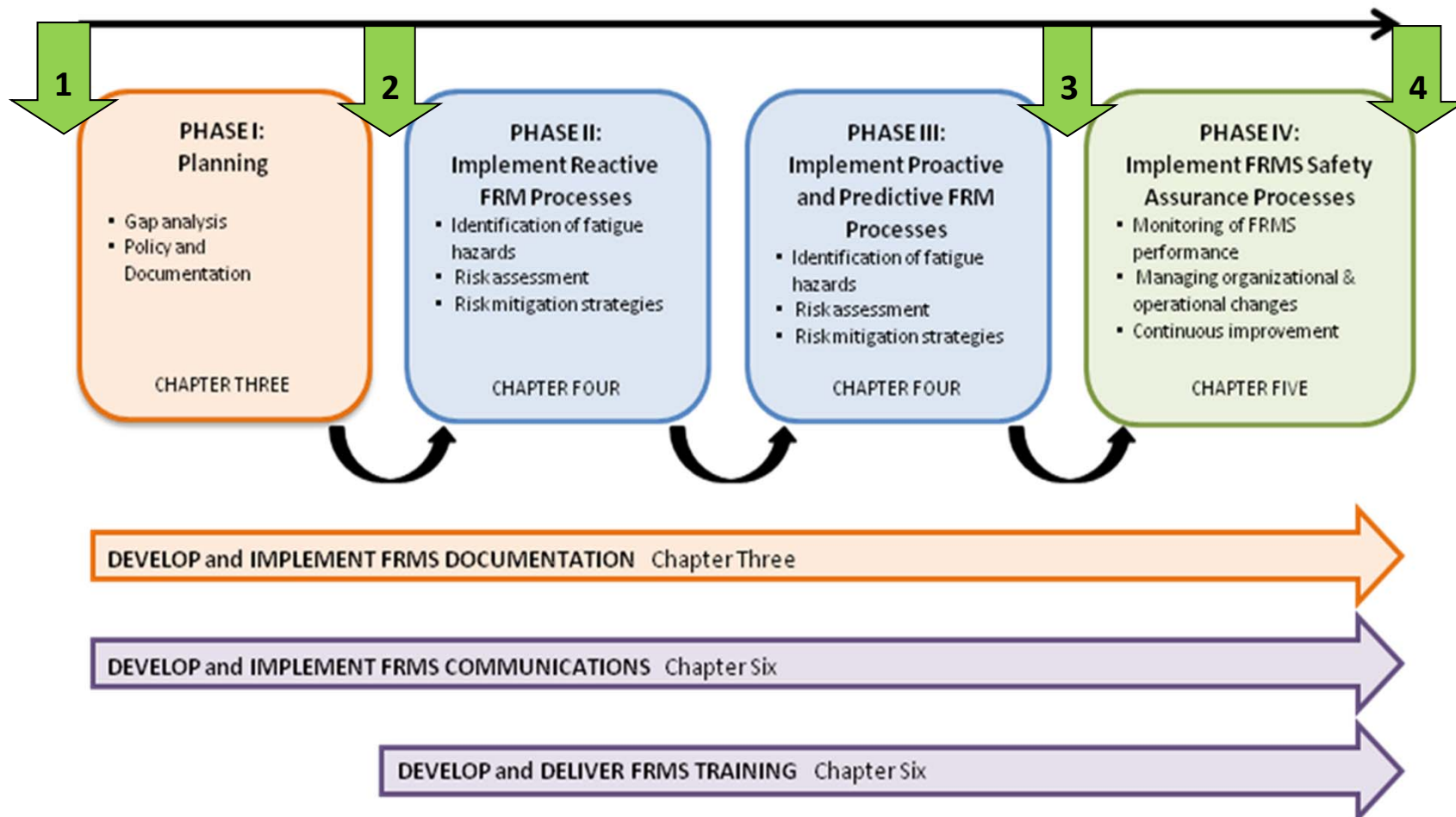
### Appendix C.

Procedures for Controlled Rest on the Flight Deck

# FRMS Approval Process



## TIMELINE



# Regulatory Milestone 1



- ✈ Notification by the operator
  - Establish open and informed relationship
  - Regulator to clearly indicate expectations and requirements
  - Requirements
    - Notification of intent is received from an Operator
    - Confirm key personal in place
    - Review resources to support development
    - FRMS Checklist
    - Review Operators Implementation Plan
    - Conduct a risk assessment of the Operator
    - Acceptance of the Operators Implementation Plan

# Regulatory Milestone 2

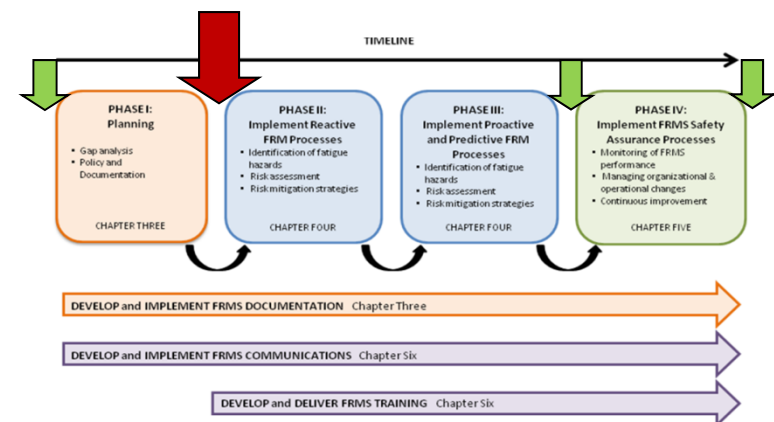


## → Review of FRMS Plan, Policy and Documentation

- Early identification of operator 'weak spots'
- Confirms operator understanding of requirements
- Provides evidence of operator commitment

## • Requirements

- Policy reflects the organisational commitment
- Commitment of the Accountable Manager
- Fatigue reporting process
- Scope of FRMS
- Fatigue Safety Action Group
- Initial system processes

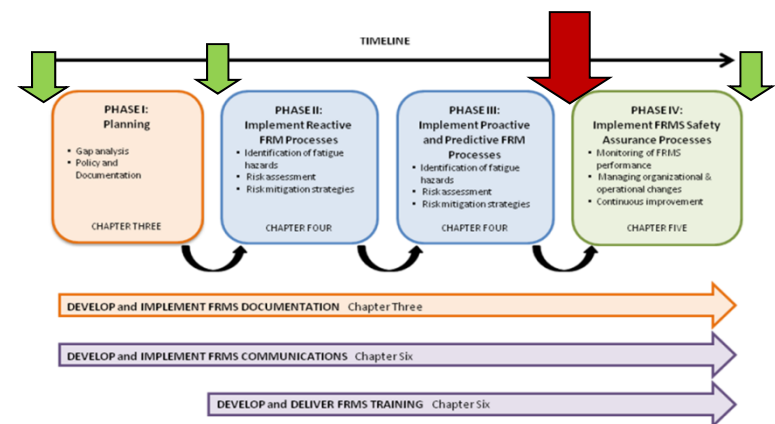


# Regulatory Milestone 3



## → Acceptance of initial FRM processes

- Review data and information collected
- Review collated reactive, proactive and predictive risk assessments
- Review proposed risk mitigations
- Agree to adjustments in the mitigations if necessary
- Review initial training programme
- Review fatigue safety promotion material and methods
- Agree on a trial timeline



# Trial period prior to Approval



- ➔ Operator can start to operate under the scope of the FRMS

BUT

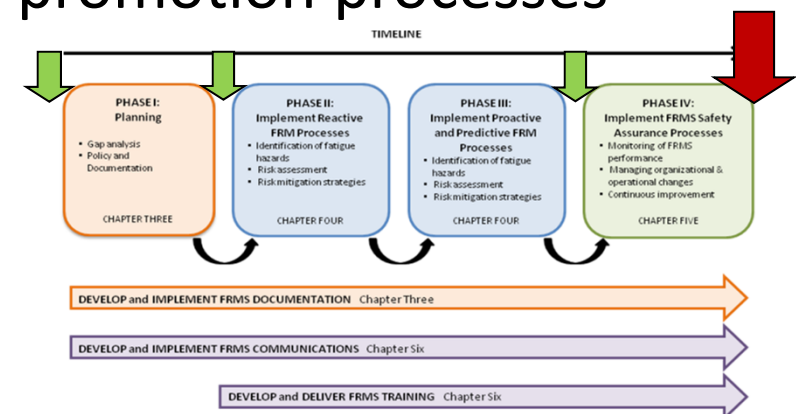
- ➔ Under closer Regulatory oversight including:-
  - Frequent information feedback requirements
  - Frequent oversight visits
  - Direct inspection of the operation(s) under the trial

# Regulatory Milestone 4



## → Approval of FRMS

- Validation of the FRMS assurance processes
- Review performance against the agreed SPI's
- Revise limits as required
- Review change management as a result of assurance functions
- Review continuous improvement processes
- Review recurrent training and promotion processes
- Review final documentation
- Grant Approval





# Attention Grabbers

- Aesthetics vs substance
- Unbalanced use of statistics or science
- Lack of understanding of individuals' involvement and how they will be treated
- Reverse engineering the result
- Lack of feedback
- Rushed implementation
- Unclear policy and commitment
- Lack of resources
- Don't pass the show me test

# FRMS Oversight



- ➔ Regulatory planning functions
  - FRMS audit /inspection schedule
  - Inspectorate training and experience
- ➔ Special requirements for FRMS oversight
  - FRMS performance indicator and target review
  - Sampling of records and documentation
  - Documented interviews
  - Continuous reporting
  - Attendance at meetings, training sessions
  - Evidence of information flow between SMS and FRMS
  - Review of FSAG hazard logs and meeting minutes
  - Reviewing outer limits

# FRMS Oversight: Methods



- Gap analysis
- Do you do what you say you do?
- Show me...
- Assessing FRMS performance indicators and targets
- Engaging at different levels
- Asking difficult questions
- Judging the responses and evidence
- Review of assurance functions and actions required
- Assess overall buy-in and the interfaces between departments



# FRMS Oversight: Questions to Ask



- Has the fatigue risk clearly been identified?
- Who has ownership of the fatigue risk assessment?
- Is the language, fatigue risk matrix and process appropriate?
- Who has taken part/ contributed to the fatigue risk assessment?
- Does the fatigue risk assessment give you all the relevant information to make an assessment?
- Is the fatigue risk assessment objective?
- Have assumptions been made?
- Does the fatigue risk assessment have a conclusion?
- Do you understand it?
- ....Is it reasonable?



# Attention Grabbers



- Organisational changes (people / processes / operation)
- Consistently few fatigue reports, all with significant fatigue issues
- Unbalanced use of statistics or science
- Assurance audit findings remaining open
- Lack of understanding of individuals' involvement
- Lack of feedback – both to the operator and from the operator
- Withdrawal of resources

# Enforcement options



- Notice to improve FRMS processes
- Regulator-mandated lowering of outer limits
- Withdrawal of FRMS approval





**Thank You**





North American  
Central American  
and Caribbean  
(NACC) Office  
Mexico City

South American  
(SAM) Office  
Lima

ICAO  
Headquarters  
Montreal

Western and  
Central African  
(WACAF) Office  
Dakar

European and  
North Atlantic  
(EUR/NAT) Office  
Paris

Middle East  
(MID) Office  
Cairo

Eastern and  
Southern African  
(ESAF) Office  
Nairobi

Asia and Pacific  
(APAC) Office  
Bangkok



**THANK YOU**

# Do we have the resources?



→ Identified risks associated with accident rates:

**#1: USOAP results are highly correlated to accident rates**

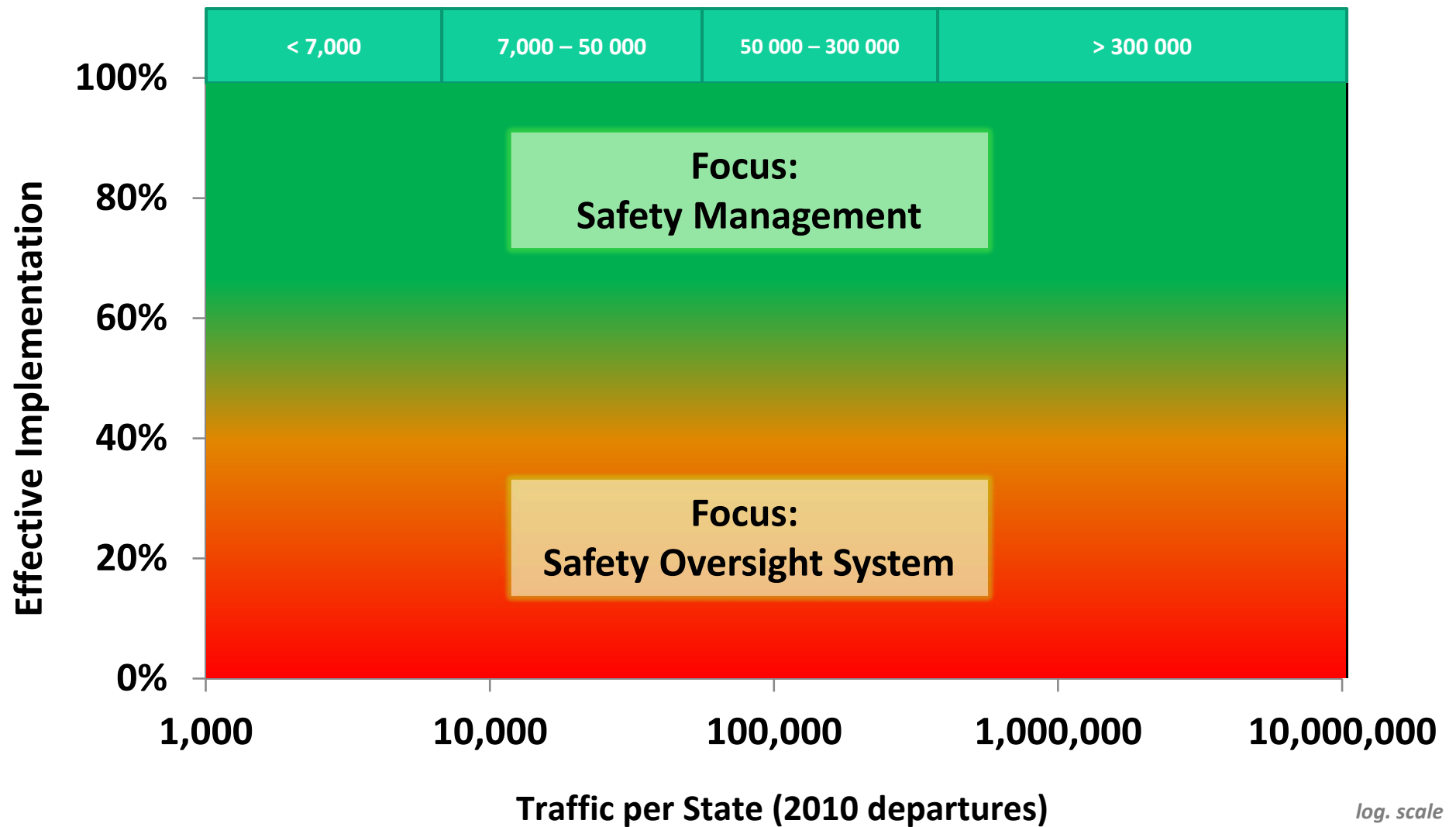
**USOAP performance is positively correlated with accident rates**



**#2: Traffic is a factor of risk**

**Traffic volume increases risk exposure**

# Deciding to offer FRMS regulations



# Global USOAP Results

## Average Effective Implementation by Region

