7th APRAST

SMS/SSP Workshop Outcome

31 August 2015

Bangkok, Thailand

- **SSP/ SMS Implementation Challenges – Obstacles – Barriers - Needs**

  - Regulatory & Industry perspective

Outcome:

- Lack of Ministerial understanding and support plus funding
- Lack of guidance/ methodology on State defining safety database / SPIs / SPTs / Acceptable Level of Safety (ALoS) / QMS / SDCP
- Managing, consolidating the integration of data from multiple sources i.e. service providers, voluntary reporting etc
- Establishment of SSP procedure handbook / SSP checklist
- Setting scalable target in relation to the size and type of operations
- States to exchange experience on SSP and promote greater harmonisation in SMS requirements
  - ➢ *SMICG - Safety Management International Collaboration Group*

Outcome - Challenges:

- Risk management
- Lack of top-management commitment.
- Identifying & obtaining data in a standard and consistent format with associated protections.
- Common descriptors for flight safety data
- Lack of knowledge on SMS training requirements and SMS instructors (Region Wide)
- Communication barrier between States and service providers
- Setting scalable target in relation to the size and type of operations
- Performance Based oversight

Outcome - Areas where more information is desired
Through workshops, guidance material, training and/or go-teams:

- Developing/ managing AloS, SPI, SPT, SMART targets
  - HIRM information (Risk Register) to identify SPIs
  - best practice for setting metrics and targets
  - evaluation of targets; and appropriate management response
- Comprehensive briefing session on ICG activities
- Risk management
- SSP training especially for top-management to understand the benefits
- Guidance material on SMS training; distribute to APRAST members
- Develop SMS instructor pool (de-identified and shared by volunteering service providers)

Team A

Summary - SSP Session:

- **[Coordination] [Resource]** Coordination between different government agencies on the establishment of SSP. Other government agencies think that SSP is a civil aviation related matter and lack active participation.

- **[Safety data protection]** With regards to encouraging reporting and safety data protection, there may be a need to change both the aviation law and also the prosecution law.

- **[ALoSP establishment]** Regarding ALoSP establishment, CAAs are under-staffed and the concept of ALoSP is difficult to understand. These may lead to the low number of States that have ALoSP established. Also, it is difficult to establish MRO related ALoSP items due to the lack of data.

Summary - SSP Session:

- **[Simple Safety reporting] [quality of reports]** Safety reporting system should be simple yet the quality of reports cannot be compromised.

- **[Misunderstanding ALoSP]** There may be mis-conception for service providers to understand meeting ALoSP or SPT targets as regulatory requirements.

- **[SSP implementation workshop]** There are a lot of SSP theory training, however more practical workshops or forum to exchange SSP implementation experience is favourable.

- **[SSP training for top-management] [Commitment]** SSP training for different level of personnel within a CAA is required. Especially for top-management for them to understand the benefit of implementing SSP. Lack of top-management commitment.

- **[De-identification of safety information]** It may be difficult for "smaller" States to de-identify safety information given the uniqueness of their individual service providers.

Summary - SMS Session

- **[Communication barrier]** Communication barrier between States and service providers. It is recognized that building trust between CAA and service providers is important to encourage communication.
- **[Risk Assessment]** It is recognized that risk assessment may be abused and used to gain benefit.
- **[Safety Promotion]** Safety promotion materials should be put in simple/understandable manner (depending on the target audience group (ie. pilots/atc)).

Team B

SSP Safety Policy and Objectives

- Collaboration from all government agencies to a common goal. Complex stakeholder relationship with a SSP. Who's responsible?
- Just culture - Enhancing a good safety reporting culture.
- Unclear definition of policy and objectives. Confusion regarding people's mindset regarding the requirements.
- Just another regulatory requirement attitude.
- Clarifications on how surveillance and enforcement. Liaison between government and operator regarding enforcement policy.
- Government support to incorporate the SSP.
- Disconnection between the SSP and SMS.
- Cost of implementing a SSP (Budget). Trade-off between cost & benefit.
- No consistent approach to SSP across all States.
- Sharing of lessons learnt and openly sharing these lessons.

SSP Safety Risk Management

- Risk tool available for use to store all the risk management issues/treatments/controls (outputs).

- Getting access to right data and information.

- Checklist regarding initial acceptance. All operators should have and accept/agree with SMS requirements.

- Inconsistent approach for a SMS across variety of stakeholders.

- Understanding operational requirements to identify the risks.

- Train our inspectorate on how to conduct risk management.

- Clarification of risk management. Business improvement tool.

SSP Safety Assurance

- Identifying and setting targets on safety performance indicators.
- Lack of safety data available.
- Lack of confidence and competence in a SMS audit.
- No international or regional benchmark indicators. No guidance provided. Lack of SPI benchmark or SPI development.
- Consistent application of Safety Performance Measures.
- Communication with industry approach.
- How is data stored and collected effectively.
- Joint access to safety data between the operator and regulator.
- How aware are regulators of the available data being collected by operators.
- Communication issues which is important because communication leads to data which is a valuable asset towards the SSP.

SSP Safety Promotions

- Further training requirements to explain a SSP.
- Obtain adequate resources for safety promotional products.
- Encourage investment in education & promotion.
- Important to have a positive relationship between the Regulator & Operator.
- Doing a SMS for a small operator. Problem with GA operators.
- Training provided is too high level and doesn't go into enough detail regarding the four pillars.
- Training for a SSP for inspectorate.
- Regulator to walk the talk and exercise just culture

SMS Safety Policy and Objectives

- Agreement from senior management to prioritise safety.
- Policy – Description of the policy needs to underpin the culture of the organisation.
- Management needs to understand the cost benefit of a working SMS.
- Objectives must be SMART.
- Communication of relevant safety policy.
- Identifying process champions.
- Service providers struggle to set the accurate policy and objectives.
- Need for an acceptable level of safety performance (ALoSP)
- SMS requirements for Foreign operators.
- Understanding a just culture concept.

SMS Safety Risk Management

- Smaller industry sectors (GA) don't see the value and understand the risk management concepts. Also seen as a cost burden.
- Apply all available data both internal & external and apply that to the organisation.
- Don't scare smaller operators by making a SMS requirement complicated.
- The operator and regulator need to agree on the same risk management process.
- Education of risk management concepts.
- Sharing the risk with relevant service providers.
- Reverse engineering risk.
- **Skillset associated with the risk management concepts. Everyone needs to be on the same page.**

SMS Safety Assurance

- Honest appraisal. Conduct in depth audit of the organisation.

- Emphasise the issue of data quality and how important it is.

- Educate the need to capture consistent data as it will identify key areas of where further investigation needs to be conducted.

- Need of independence of the quality assurance system.

- Two way communication between the regulator and operator.

- **Identifying & obtaining data in a standard and consistent format.**

- Improving the safety performance indicators and trusting the model being used in the calculation.

SMS Safety Assurance

- **Lack of tools to analyse safety related data.**

- Lack of employee involvement.

- New operators find it difficult do identify meaningful safety performance indicators. Don't know what they want to achieve and do it just to comply with regulation.

- Data sharing within the whole aviation community at a de-identified level.

- Unable to de-identify data given small number of operators.

- **Reporting culture – not willing to report.**

- Mandatory reporting is not effective. Under reporting of occurrences.

SMS Safety Promotion

- Training will be dependant upon the key issues identified by the data.

- Retaining adequately trained personnel.

- Standardise auditing requirements and training associated with inspectorate.

SSP Implementation (States)

Key Outcomes

- SPIs/SPTs important to monitor effectiveness of SSM

- SMICG a platform for States to exchange experience on SSP and promote greater harmonisation in SMS requirements

  SMICG - Safety Management International Collaboration Group

- SMICG priorities

  - collaborate on common SMS/SSP topics of interest

  - lessons learnt

  - promote the harmonisation of SMS requirements

  - Tools / products

SSP Implementation (States)

Key Outcomes

- Close collaboration between States and local industry stakeholders key to implement an effective SMS

- Constant review of SMS manual, audit guidance, SPIs, SPTs, assessment checklist to improve quality of SMS oversight

- Be realistic in setting SPIs/SPTs

- Training / briefing to keep auditors competent

- Analyze data to identify trending risks and mitigate

- Continuous effort in promoting safety culture / mindset change

SMS Implementation (Industry)

Key Outcomes

- Understanding roles and responsibilities in SMS i.e. accountable manager / execution of airlines safety priorities

- Prioritise hazards from organisation hazard register / utilizing safety tools available Be realistic in setting SPIs/SPTs

- Monitor safety performance of service providers

- Integration between SMS and QMS, Human Factors, Environment, Security, Occupational Health

- SMS maturity and safety culture (Documentation vs Implementation)

Team C

SSP Implementation - Breakout Session

- **Key Challenges (SSP)**

  - Lack of guidance on State defining safety database / SPIs / SPTs / Acceptable Level of Safety (ALoS) / QMS / SDCP

  - Managing, consolidating the integration of data from multiple sources i.e. service providers, voluntary reporting etc

  - Establishment of SSP procedure handbook / SSP checklist

  - Setting scalable target in relation to the size and type of operations

  - Lack of understanding and support at Ministerial level

  - Funding of SSP in States

  - Guidance on the establishment of SSP administration infrastructure

  - Capability to provide guidance to ANSPs on SMS implementation

  - ICAO / advanced States assistance to other APRAST States

  - Effectiveness of ICAO SMS training courses to States

  - ALoS in small States vs big States

SSP Implementation - Breakout Session

- **Key Challenges (SSP)**

  - Transition and integration of systems to an SSP

  - Guidance required on quality and audit system

  - More guidance required on SDPS Annex 19 Chp 5. No reporting system structure. States still awaiting provision of training from ICAO

SMS Implementation - Breakout Session

- **Key Challenges (SMS)**

  - Asia struggling with the principle and mindset of just culture. Questionable regulator and management attitudes

  - Paper SMS

  - Trust of employees e.g. pilot in SMS / flow of info / just culture

  - Honest mistake vs violation

  - Knowledge to increase awareness

  - Knowledge in setting SPIs

  - Accountability - top down – Recognition of roles and responsibilities

  - Current practice - more reactive than proactive

  - Lack of understanding of SMS philosophy

  - Difficulty for new air operator to have SMS and States not ready to assist

  - Integration of SMS with other stakeholders e.g. airport, ANSP

  - Airbus/ Boeing to comment on their SMS and what guidance is available to the OEM

SSP / SMS Implementation - Breakout Session

- SMS contd.

  - Skybrary source of information for SSP/ SMS implementation

  - Effective communication between States / air operators / ANSPs / airports / service providers critical in implementing a successful SMS

Team D

SSP Go Teams – National Safety Team Concept

1. Need consultation.
2. Promotion
    a. Need National Safety Team / Forum…
        i.   To plug into RASTs
        ii. To gain support from RASGs

Future Workshops

Hazard Identification
     Investigation (Root Cause Analysis)

ERP

Risk Management

Safety Assurance
     Training
     How to measure
     Quality Assurance vs Safety Assurance (QMS vs SMS)

Influencing Senior Management

1. **Hazard Identification**

   a. Gaps

      i. Identifying sources of Hazard Information

      ii. Initiating the Hazard ID process

      iii. Root cause analysis

   b. Recommended actions

      i. Workshops on the above topics

      ii. Use of case studies to provide real examples

Session 4 SMS Breakout Session - Outcomes

2. SMS Training

   a. Gaps

      i. Lack of knowledge on SMS training requirements for operator staff

      ii. Lack of SMS instructors – Region Wide

   b. Recommended actions

      i. Produce or refer to guidance material on SMS training; distribute to APRAST members;

      ii. Develop SMS instructor pool (de-identified and shared by volunteering service providers)

Session 4 SMS Breakout Session - Outcomes

3. Change Management

    a. Gaps

        i. Financial Risk Management vs. Safety Risk Management

        ii. Involvement of all stakeholders

    b. Recommended actions

        i. Workshop to teach Change Management process

        ii. Case Studies to provide real examples (de-identified and shared by volunteering service providers)

Session 4 SMS Breakout Session - Outcomes

4. SPI / SPT

   a. Gaps

      i. Lack of guidance to establish SPIs

      ii. Establishing SMART targets

      iii. Evaluating targets

   b. Recommended actions

      i. Workshop on:

         ➢ use of existing data including HIRM information (Risk Register) to identify SPIs

         ➢ best practice for setting metrics and targets

         ➢ guidance on evaluation of targets; and appropriate management response

Session 4 SMS Breakout Session - Outcomes

5. Safety Risk Management Tools
   a. Gaps
      i. Lack of robust / cost-effective tools to assist in SRM processes
   b. Recommended actions
      i. Volunteering airlines to share best practices in safety reporting tools
6. Common descriptors for flight safety data
   a. Gaps
      i. No global or regional initiative to standards flight safety data descriptors
   b. Recommended actions
      i. Regional Safety data and information sharing project capture this task.

Session 4 SMS Breakout Session - Outcomes

1. Performance Based oversight is Key
2. States need to establish its performance objectives

    Establish what needs to be measured; so airlines can measure where you are compared to where you were. First step, start measuring…and the State dictates what must be measured; …

1. States need data…information exchange (protections need to be in place)
2. States need to establish safety performance thresholds based on the scope and complexities of its operators
3. How does a State establish it's SPIs…
4. Standards for Data FD Monitoring parameters…