

SMS Implementation

Implementation plans are flowing into the CAA for approval. If you're still unsure how to go about yours, here's some advice from two companies whose plans have been approved.

Getting Started

"This was the most difficult part," says David Norris, Quality Assurance Manager for the Hamilton-based Kiwi Balloon Company. "But using the structure of Revision 1 of AC100-1 really helped. It breaks down the components of SMS and provides explanations. Setting up a table using the template from Annex D created a means of making a structured start to building the gap analysis."

Assessing Risk

Tim Rayward, Manager of Flight Operations at Air Safaris, in the Mackenzie Country, says most aviation operations would have been assessing and managing risk for years.

"There's no need to reinvent the wheel. We just looked at what we already had in our exposition, our SOPs, our training manuals, checklists and so on. It was almost all there already."

"The challenge for us was in documenting it in a coherent way, so anyone coming in from outside can quickly see what we are doing."

David Norris kick-started his company's process by looking at its existing health and safety hazard assessments which, in part, incorporated risks.

"I then added in risk scores for all stages. That included a risk rate for the hazard or risk, then a second risk rate, once controls have been put in place. I used the risk matrix from CAA SMS Booklet 4."

The company also updated its safety policy to incorporate SMS. That has the added benefits of bringing up to date any documentation, for both the new health and safety legislation and SMS.

"Updating the policy also shows a commitment by the company to SMS," David says.

Tailoring it for Your Company

David says using the gap analysis template, he worked through the Kiwi Balloon Company exposition to see what matched.

"Most of the body of SMS exists within the exposition. Start with the operational aspects because getting those into place and working gets the system nominally operational."

"Then I was able to assess where the shortfall was, what action or task was required and briefly summarise that, assigning staff members to those tasks."

Tim believes rather than companies starting with the SMS documentation and looking at how they already comply, they should do it in reverse.

"You could lose your way a bit starting with SMS requirements. It's better to look first at what you have in play, then match it to the SMS material."

"For instance, to comply with the rules, we have fuel management policies to manage the risk of running out of fuel. So that's all in place. Really, it's not like we need to do anything more."

Working With the CAA

David Norris says he enjoyed working with the CAA staff on the implementation plan.

"I think we're all learning and everyone needs to share knowledge and experience."

"It's far better for people in the aviation industry to see CAA as a facilitator rather than a regulator policing the rules. Too many people regard ignorance of what SMS entails as a defence."

Other Bits

Both companies made use of the evaluation tool, which provides key indicators and means of compliance acceptable to the CAA.



Plans – Top Tips

David Norris advises that companies really take their time working through the evaluation tool. “You cannot take shortcuts with this. The CAA will be looking for the detail of ‘Element 0’ which is in the evaluation tool, to appear in your application with the gap analysis.”

The evaluation tool (CAA form 24100/2) is at www.caa.govt.nz/Forms.”

David says one set of risks every operator needs to think about is ‘what if I cannot run the business or fly the aircraft?’

“The risk that needs to be considered in an SMS is what action will be taken if, say, a pilot leaves during the peak of the business operation. SMS is also about sustaining the business.”

David says the SMS implementation plan should include how long the company estimates it will take for each SMS task to be completed. He also says included in the thinking about SMS should be the consideration of the cost to move to a Safety Management System.

Up and Running

David says once the operational side of SMS is in place, he’ll concentrate on the management aspects, including monitoring.

“SMS cannot be put on a shelf to gather dust. Whether or not the SMS hazard and risk documentation has been part of an internal review will be a key part of any CAA audit. The documentation may not need to be changed, but it does need to be reviewed.

Building a Culture

Tim Rayward says apart from the nitty gritty of keeping documentation and procedures updated, there is a ‘big picture’ approach that will keep SMS fresh.

“You can have a Safety Management System sourced in your exposition and other safety documentation, and there is nothing wrong with that,” he says.

“But you can go further and make your SMS your safety ‘umbrella’, and take it into every aspect of your operation. For instance, with active staff involvement, with regular round table staff meetings about safety, with a robust reporting system, with the QA pilot and manager talking about safety every single day.

“At Air Safaris, risk and safety is not something ‘added on’ to our business-as-usual. It forms the basis of our business-as-usual.

“For us, SMS will be a way of thinking, not just compliance.”

The Assessment

The CAA says the Kiwi Ballooning Company clearly identified the current state of the organisation, where it wanted to be and therefore where the gaps were.

“David identified what was needed under SMS,” says CAA’s SMS team member Adrian Duncan. “He looked at what the company needed to meet those requirements. And crucially, he documented everything.

“Then he took the information he’d gathered about the ‘gaps’, assigned time and resources and people to them, and that showed a clear plan of how the company was going to get there.”

SMS team member Austin Healey says Air Safaris’ implementation plan was impressive in that it provided an overall picture of how they intended to proceed, supported by a clear and logical timetable of activities, risk management and governance.

“It was just what we were looking for to give us confidence that the plan could succeed,” he says.

For more information about SMS, go to www.caa.govt.nz/sms.

To keep up to date with developments in SMS, subscribe to our email notifications at,

www.caa.govt.nz/subscribe

For free booklets on implementing a Safety Management System, email sms@caa.govt.nz. ■

Tim Rayward, “SMS will be a way of thinking, not just compliance.”
Photo courtesy of Air Safaris.