

SAFETY MANAGEMENT SYSTEMS



Bob Hoy, who has had over 50 years in the aviation industry, in a variety of roles, including that of safety consultant, looks at the role of an auditor in supporting SMS.

In today's aviation industry, operators, maintainers and support providers are being tasked to focus their attention on implementing one or more safety management programs.

Many of you reading this article would be aware that companies are now far more accountable for their activities - not only from a corporate point of view, but to the Civil Aviation Safety Authority.

Our Australian legislation requires many things of a company, some of which are found in Section 28 BD of the Civil Aviation Act which states: 'the holder of an Air Operators Certificate (AOC) must comply with all the requirements of this Act, the Regulations and the Civil Aviation Orders that apply to the holder'.

Additionally, Section 28BE (1) of the Act states: 'the holder of an AOC must at all times take reasonable steps to ensure that every activity

covered by the AOC, and every thing done in connection with such an activity is done with a reasonable degree of care and diligence'. This section then goes on to refer to company directors etc.

These types of requirements, have resulted in safety management programs, (along with numerous systems and procedures) being introduced with the ultimate goal of delivering an affordable and safe product to the public.

I guess the million-dollar question is: How do we know that a safety management programme is *healthy, effective and achieves the desired outcome?*

One tool used is that of safety auditing.

Safety audits can and do provide (if carried out in an appropriate manner) a measure of the 'safety, compliance and health' of the organisation at a specific point in time.

So how do you go about your duties as an auditor?

First and foremost, an auditor should not underestimate the importance of their role in the auditing process.

Organisations rely heavily on the outcomes of an audit. So here are some tips to assist auditors in carrying out their role.

- ▶ Clearly identify the scope and depth of your assigned tasks in the audit
- ▶ Do your preparation before commencing an audit
- ▶ Identify your findings clearly and objectively, this includes attaching documented evidence to support your findings
- ▶ Be totally honest and truthful in everything you do.
- ▶ Do not accept a person's word. Check out its authenticity - including documented evidence.

Note: Commissioner Justice Staunton (as a result of the Seaview Inquiry) in a recommendation stated in part – 'Information must be checked for its veracity and accuracy. Assurances should be followed up'.

- ▶ Leave your personal feelings about a person or persons at home
- ▶ Remember you are required to be specific and objective in your report
- ▶ Should you come across something which either starts the 'alarm bells ringing' or just 'doesn't sit right' but falls outside the scope of the audit, identify this to your audit team leader, verbally, and follow up in writing
- ▶ Do not be put off by supervisors/managers who (possibly through ignorance) consider that the audit you are participating in 'is a pain in the backside'.
- ▶ Keep your own copy of any report or document you raise, particularly if you think there may be/could be some controversy as a result of your audit.

Even though the above may appear to be onerous and cumbersome, it can have a positive effect on the way in which an audit is completed.

ALWAYS REMEMBER YOU HAVE A DUTY OF CARE

Keep in mind, that down the track, should 'the balloon go up' and you are required to give evidence before a Royal Commission, an Australian Transport Safety Bureau investigation, a coronial or a senate inquiry, it is much easier to be able to refer to documented evidence than rely on your memory.

Finally, do not think for one minute that as a result of an accident or incident files don't disappear – THEY DO.

Post-audit

What follows on from an audit is critical to the success or failure of any safety management system.

If a deficiency is found during an audit which requires the issue of a formal notice because of non-compliance with legislative requirements, or because it is contrary to company procedures and results in an unsafe or non-compliant situation, it is essential you interpret the legislation or company procedure correctly.

A good safety management system will provide a process whereby deficiencies when correctly identified are addressed. Some deficiencies may be rectified easily and quickly, whilst others will take time, perhaps requiring additional human and financial resources.

Whichever way management determine to address the deficiencies and ensure the SMS remains effective and worthwhile, time limits must be set and adhered to. Allowing identified deficiencies and the associated risks to remain uncorrected for months and sometimes years negates the purpose of the original audit. It also brings into question the robustness of their SMS and the company's management ability to oversee the program.

One should always keep in mind the 'Swiss cheese' analysis as promoted by James Reason. Invariably, there is never a single reason why an accident or incident occurs – rather several factors, many of which are totally unrelated, but which, when put together, create the environment for an accident or incident to occur. 🍷

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