



Australian Government  
Civil Aviation Safety Authority

**Safety Management Systems  
for aviation: a practical guide**

# SMS 2

## Safety policy and objectives

**3rd Edition**

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# Safety policy and objectives

The first component of a safety management system (SMS) describes your organisation's safety policy and objectives. It sets out senior management's commitment to safety, its goals, and the supporting organisational structure for the SMS.

Your safety policy and objectives should be periodically reviewed to ensure they remain current and are enhancing the SMS as it matures. It is important to remember your safety policy and objectives cannot be a 'set and forget' process. Changes to accountable executives, key personnel, and broader organisational structures need to be updated and reflected in your policy.

## Safety policy

A safety policy outlines what your organisation will do to manage safety. Your policy is a reminder of 'how we do business around here'. It is the organisation's fundamental approach to managing safety, defining management's commitment to safety and its overall safety vision.

Your safety policy is a cultural statement on a page. It needs to be in the language and style appropriate for your audience, setting the tone from the top to the bottom of your organisation.

## Safety objectives

Your safety objectives are what you are going to do – they should state an intended safety outcome. Safety objectives should be short, high-level statements of the organisation's safety priorities, and address its most significant safety risks.

As your SMS moves from implementing, to operating, through to maturing towards effectiveness, your objectives should naturally also evolve to recognise your enhanced SMS functionality and capabilities. This is a core aspect of an SMS' continuous improvement.

SMS component	Elements
<b>Safety policy and objectives</b>	Management commitment
	Safety accountabilities and responsibilities
	Appointment of key safety personnel
	Coordination of emergency response planning
	SMS documentation

# Management commitment and responsibility

Good safety management is not about having an SMS manual on the shelf, outlining each of the elements you have in place.

Safety management needs context to be effective – you need to establish a few fundamentals before you even consider things such as a manual.

The ultimate responsibility for safety rests on the shoulders of senior managers – those at the top. You should demonstrate your commitment to, and responsibility for, safety in a formal safety policy, which then flows into safety objectives. These safety objectives must be practical, achievable, regularly reviewed and reassessed, and communicated to the staff with the clear endorsement of senior management.

Management commitment needs to be visibly endorsed with active support of the policy and objectives; it is not just a signature against the policy in a manual.

Your safety policy should include a commitment to:

- continuously improve the organisation's level of safety performance
- promote and maintain a positive safety culture
- provide the necessary resources to deliver and maintain safety standards
- ensure safety is a priority consideration and responsibility for all managers
- ensure it is understood, implemented and maintained at all levels of the organisation.

Your policy should also refer to your safety reporting system to encourage reporting of hazards and safety issues, while establishing a safety disciplinary policy that allows for determining if an error has occurred, or a rule breaking or wilful violation. This will ensure fair treatment of errors, and clearly define escalations of violations for disciplinary actions.

To successfully implement an SMS, you need to:

- establish expectations – these must come from senior management. What safety standards does senior management want? What are, at a minimum, the core safety behaviours management expects staff to work towards or be seen demonstrating daily?
- engage personnel (somebody to run the SMS) with competence (some formal knowledge of safety management)
- get staff involved and committed to identifying safety risks – that way, you create a culture of shared accountability and responsibility for managing risks from the very start. The stage for a positive safety culture is set by the extent to which organisations accept the importance of proactive risk management
- do a gap analysis of your existing SMS to see what is missing and develop a customised SMS implementation plan – one that is relevant and appropriate to your organisation.

### Management commitment and responsibility checklist

- ☐ There is commitment of the organisation's senior management to the development and ongoing improvement of the SMS.
- ☐ This commitment is demonstrated in a formal safety policy that details:
  - the organisation's safety objectives
  - management support of the SMS in providing the resources necessary for effective safety management
  - who does what – a statement about responsibility and accountability for safety throughout the organisation.
  - There is tangible evidence of decision-making, actions and behaviours that reflect a more positive safety culture.
- ☐ There is a defined disciplinary policy clearly identifying when punitive action would be considered (e.g. in cases of illegal activity, negligence or wilful misconduct) and how errors or organisational conditions are considered for remediation, as opposed to disciplinary action
- ☐ There is evidence the organisation is applying its disciplinary policy while maintaining a 'just culture'

## Accountable executive setting expectations

The chief executive officer (CEO; or the 'accountable executive', depending on the type of certificate) is ultimately accountable for safety. Regardless of the type of aviation business you are in, the CEO must provide the resources necessary to implement and maintain an effective SMS. The CEO should create a clear safety vision – their expectation of why safety is fundamental to their business growth and sustainability.

Actions by management and employees can help drive their safety culture to be more positive. Within the toolkit at the end of this booklet, examples of the types of management and employee actions that will enable or disable a positive safety culture in an organisation are provided. Organisations should focus on providing enablers and removing any disablers to promote and achieve a positive safety culture.



## Case studies

The case studies of **Bush Aviation and Training**, a fictitious flying school looking to move into air transport operation, and **Outback Maintenance Services**, a fictitious maintenance organisation, illustrate how operators might take these steps.





## About

Bush Aviation and Training is a small, family-owned charter flying school based at a regional airport. The company employs four full-time instructors and one admin staff member. The chief pilot owns the business and directs day-to-day operations, as well as occasionally working as a relief pilot.

The company owns and operates a range of single-engine aircraft for flight training. A local on-airport maintenance organisation is contracted to provide maintenance.

Safety is managed informally, with an open communication policy and a written safety reporting policy. There is no dedicated resource for safety management.

The chief pilot has identified an opportunity to conduct non-scheduled air transport operations to meet increased demand from local businesses and tourism activity in the area. The company intends to re-equip progressively with larger twin-engine aircraft, taking on additional pilots and bringing aircraft maintenance in house. He expects that this growth will require 10 full-time pilots, eight support staff, including maintenance personnel, and eight aircraft in the expanded fleet.

To support the organisation's application for a Part 119 Air Operator's Certificate, the chief pilot has started drafting up Bush's safety policy and management commitment as follows.

## Vision

### 'We are all leaders in safety'

Safety leadership ultimately comes from the top, but everyone at Bush Aviation, regardless of position, can make a significant difference in reducing the number of near misses and accidents. Success in the future will depend on each one of us teaching, coaching and supporting others, so that no one is hurt, and no aircraft are damaged.

### Safety is the new economy

Safety is not just a priority, because priorities change; rather, it is our core and ever-present value. Our safety performance at Bush Aviation must continue to improve so we can lead our competition in human performance, engagement and reduced worker turnover.

### Think with both the heart and the head

Effective safety management is more than rules, training, safety meetings and a set of posters – those are just the mechanics. Everyone at Bush Aviation must believe that safety is important, make it automatic, and embrace it with all the energy, passion and personal commitment it deserves.

### The new team

Regardless of our role or professional background at Bush Aviation, we are all equal when it comes to safety responsibility – we are all in this together. I hope that you will join me in this exciting growth phase of Bush Aviation and make a valuable contribution to our safety system.

John Mathers

Chief pilot and owner  
**Bush Aviation and Training**





## About

Outback Maintenance Services is a small aircraft maintenance organisation based at a regional airport. The company was founded by LAME, Peter Lawson, to service local GA and charter aircraft. It employs two LAMEs, an apprentice and an admin staff member (Lawson's wife).

They service Bush Aviation's aircraft, as well as the local GP's Beechcraft Bonanza, and privately owned fixed-wing and rotary GA aircraft, some used by local station owners for mustering.

Outback Maintenance Services is transitioning to becoming a Part 145 maintenance organisation, with a view to meeting the future growth they see in the area. As part of this, Lawson saw the need to implement an SMS three years ago. Lawson is aware that John Mathers at Bush Aviation is considering taking his maintenance in house, but feels that with a strengthened organisation, Outback Maintenance Services could offer competitive, safe, best-practice maintenance for Bush Aviation's expanded fleet. Unlike Bush Aviation, Outback Maintenance Services manages safety formally, and is implementing a formal SMS.

Peter Lawson has ongoing meetings with the LAMEs and apprentice at smoko, keeping them up-to-date about his plans, outlining his expectations of them and the business. He is open and actively promoting safety expectations, both now and into the future. Here is his latest team briefing:

*At Outback Maintenance Services we have a proud safety record – not one of the aircraft we maintain has had an engineering accident, even a serious incident. But that doesn't mean we can sit back – far from it. We're only as good as our last job. And you all know what's happening with the mining in our area; that's where I think our future income is going to come from. I have talked to some of the people at Outback Exploration, and they have very demanding operational and safety standards.*

*We have a vision and some procedures.*

*I know safety is ultimately my responsibility, but to maintain and improve our safety performance so that we can grow as the mining industry in our area grows, all of us have to make safety the basis of everything we do.*

*As you know, Mick has put his hand up to be our safety officer, and we need to continue to work on our safety objectives, how it's all set up, and how we track how it's working.*



image: Adobe Stock | pressmaster

# Safety accountabilities of managers

## Accountable executive

The accountable executive, usually the CEO, is ultimately responsible, and holds authority for safe operations of the organisation. Organisations need to identify the accountable executive for their SMS, placing the responsibility for the overall safety performance at a level in the organisation with authority to take action to ensure the SMS is effective.

While the accountable executive has ultimate responsibility for the SMS, safety is overall a shared responsibility across all levels of management.

## All managers

All managers and supervisors are expected to show leadership and commitment to the organisation's SMS. Specific safety accountabilities of all members of management should be defined, and their role in relation to the SMS should reflect how they can contribute towards a positive safety culture.

Their responsibilities and accountabilities should include their need to:

- actively support and promote the SMS
- ensure that they and their staff comply with the SMS processes and procedures
- ensure resources are made available to achieve the outcomes of the SMS
- continually monitor their area of responsibility, as outlined in the SMS manual.

You should ensure that safety management is seen as an integral aspect of your business by giving it the highest priority. This level of commitment is vital for the effectiveness of your SMS.

Although responsibility for the day-to-day operation of the SMS can be delegated, the accountable executive cannot delegate accountability for the system, nor can decisions regarding safety risks be delegated.

## Safety manager

Appointment of a competent person to fulfil the role of safety manager is essential to an effectively implemented and functioning SMS. The safety manager may be identified by different titles and sometimes can refer to the functions performed, not necessarily to the individual.

The safety manager is responsible to the accountable executive for the performance of the SMS and delivery of safety services to other departments in the organisation. The safety manager advises the accountable executive and line managers on safety management matters, and is responsible for coordinating and communicating safety issues within the organisation, as well as with external members of the broader aviation community.

The safety manager is responsible for:

- drafting the SMS manual
- implementing, maintaining, reviewing and revising the SMS
- providing safety advice to management and staff
- promoting safety awareness and a positive safety culture
- maintaining an appropriate reporting system to identify and manage hazards
- performing or facilitating hazard identification and safety risk analysis
- investigating incidents and accidents
- monitoring corrective actions and evaluating their results
- identifying ongoing safety training requirements to support the SMS objectives
- overseeing internal and external SMS audit programs
- providing periodic reports on the organisation's safety performance
- maintaining the emergency response plan
- monitoring safety concerns in the broader aviation industry and their perceived impact on the organisation.

### Safety accountabilities of managers checklist

- |   |   |
|---|---|
| <input type="checkbox"/> The SMS roles, responsibilities and accountabilities of the positions are explicitly outlined on the organisational chart. | <input type="checkbox"/> The safety manager reports to the CEO, with direct access to the CEO at all times. This is formalised in the organisational structure.   |
| <input type="checkbox"/> All managers ensure sufficient resources are made available to achieve the outcomes of the SMS.                            | <input type="checkbox"/> To demonstrate their ongoing support for the SMS, managers: <ul style="list-style-type: none"> <li>– have ensured due processes and procedures needed for safe operations are in place</li> <li>– have made sufficient resources available to support the SMS</li> <li>– are continually monitoring their areas of responsibility, as outlined in the SMS manual.</li> </ul> |
| <input type="checkbox"/> The safety manager has established working arrangements with the local management team to meet SMS objectives.             |   |
| <input type="checkbox"/> The structure of the organisation is documented so everyone understands their roles and responsibilities.                  |   |

On your organisational chart, clearly detail the SMS roles and responsibilities of each staff member and manager.



image: Civil Aviation Safety Authority

## Safety accountabilities of all staff

Accountabilities and responsibilities of all personnel, management and staff involved in safety-related duties supporting the delivery of safe operations should be clearly defined and documented. These should focus on their contributions to the safety performance of the organisation, and that management of safety is a core function across all levels of the organisation.

All levels throughout the organisation should be aware of and understand their safety accountabilities and responsibilities, with clear expectations made on acceptable and unacceptable safety behaviours. This is an opportunity to further promote your safety culture and identify unacceptable behaviours (e.g. cases of illegal activity, negligence, wilful misconduct or violations) that would result in disciplinary actions, as opposed to errors, which are learning opportunities for the organisation under the SMS.

All defined accountabilities, responsibilities and authorities should be stated in the SMS documentation and be communicated throughout the organisation.

# Appointment of key safety personnel

## Safety manager

Appointing the right safety manager is critical. This role can make or break an SMS. A large organisation might have a dedicated safety department, led by a head of safety management.

A medium-sized organisation might have a separate safety manager, possibly with a small number of staff. A small organisation might just appoint a part-time safety manager or add these duties to an existing role.

In some organisations, it may even be appropriate to distribute the functions of the safety manager across a group of people or organisational roles, as opposed to a single role or person. However, if you are allocating the safety manager function across a group of individuals, one person will need to be designated as lead safety manager to maintain a direct and unequivocal reporting line to the accountable executive.

Depending on the size of the organisation, you should ensure the safety manager has operational management experience and an adequate technical background to understand the systems supporting your operations. Operational skills alone will not be sufficient. The safety manager should have a sound understanding of safety management principles, typically acquired through both formal training and practical experience.

The safety manager needs certain knowledge for the role. You would not expect just anybody to service one of your aircraft simply using common sense to operate the controls, or to maintain its avionics. Similarly, safety management is underpinned by basic scientific principles and personal skills that safety managers need to learn.

Before you appoint someone, develop a position description for the safety manager, outlining their specific duties. A safety manager needs to have (or be given the opportunity to develop) key competencies and knowledge of the following:

- safety management principles and practices
- an understanding of human factors and human performance principles
- written and verbal communication skills
- analytical and problem-solving skills
- project management skills
- interpersonal skills
- computer literacy
- the ability to relate to people at all levels, both inside and outside the organisation
- safety training development and delivery experience.



Ideally, the safety manager should be a person who is approachable, convincing, reliable, able to stay cool under pressure, and above all, tenacious.

Your safety manager might need formal training in:

- integrating human factors into an SMS
- familiarisation with different fleets, types of operations, routes
- developing, implementing, operating and maintaining an SMS
- investigating accidents and incidents.

When appointing a safety manager, you will need to consider any potential conflicts of interest with other tasks and functions. Such conflicts of interest could include:

- competition for funding (e.g. financial manager being the safety manager)
- conflicting priorities for resources
- where the safety manager also holds an operational role (i.e. pilot or LAME) – they need to be able to objectively assess the SMS effectiveness of the operational activities they perform.

The competencies, characteristics or behaviours an effective safety manager should demonstrate, as listed in this book, go beyond the minimum required experience levels for CASA approvals as part of a post holder role. It is important for an organisation to recognise minimum experience levels required under regulations for safety managers, and the intended purpose and characteristics of a safety manager can be two very different categories. While minimum levels of experience will always be required of a safety manager, an organisation striving for a positive safety culture will always look to go beyond regulatory minimums when appointing key safety personnel.



Image: Civil Aviation Safety Authority



image: Adobe Stock | pressmaster

## Bush Aviation Safety Officer



The chief pilot drafts a position description for a part-time aviation safety officer, with the expectation that the role will grow with the business.

The chief pilot appoints one of his instructors, Patricia Chee, to the role and decides to send her on two training courses as a quick way to improve her safety management knowledge and skills and build on her university study:

1. safety incident investigation training  
– two-day course
2. human factors and error management  
– two-day course.

By doing this, Mathers can utilise her skills and passion. These courses cost \$4,000, but the chief pilot feels this is a good investment in the future of his company.

The aviation safety officer arranges for one of CASA's aviation safety advisors to visit and provide further advice on the SMS. Bush Aviation's safety officer receives some free CASA safety promotion products to further build the Bush Aviation SMS. The safety officer also attends free workshops and seminars on safety management hosted by CASA in the region.

## Bush Aviation safety committee

Armed with the training Bush Aviation has provided, the safety officer establishes a safety committee, comprising the chief pilot / CEO, one of the full-time pilots, the safety officer and the administration staff member.

They also invite a representative from the local on-airport maintenance organisation, Outback Maintenance Services, to meetings.

The appointment of the safety officer and establishment of the safety committee allows Bush Aviation to distribute the intended safety manager functions across various roles, while ensuring a lead person (safety officer) is maintaining the overall functions of the SMS and has a direct reporting line to the accountable executive (chief pilot). Appointing a part-time safety officer gives Bush Aviation additional safety management capabilities to a level currently needed for its operation, while allowing for possible expansion to a full-time position as the organisation grows. This is an example of an SMS being tailored and scalable for the organisation's size and complexity.

## Safety committee and action groups

Organisations should establish safety committees that support the SMS across the organisation. Depending on the size and complexity of the organisation, determining who should be on the committee and how often it meets will vary.

Generally, for larger or more complex organisations, the highest-level safety committee, which the International Civil Aviation Organization (ICAO) refers to as a safety review board (SRB), includes the accountable executive and senior managers from all involved departments (i.e. finance, personnel, as well as operations, maintenance etc.), with the safety manager acting in an advisory capacity. The SRB oversees the SMS program and is accountable for making strategic safety decisions. The SRB is then supported by safety action groups (SAGs) that report into and take strategic direction from the SRB.

SAGs are more operationally focused, are normally composed of managers and front-line personnel, and are chaired by a designated manager. SAGs are tactical entities that deal with specific implementation issues in accordance with the strategies developed by the SRB.

SAGs within their operationally functional area perform the following functions:

- monitor operational safety performance and ensure appropriate safety risk management activities are carried out
- review safety data and identify appropriate risk controls
- ensure employee feedback is provided
- assess safety impacts of any operational changes
- coordinate implementation of risk controls and ensure actions are taken promptly
- review effectiveness of safety risks controls
- report to the SRB for any identified areas for strategic risk management enhancements and provide an overall status check of the SMS program within their area.

However, smaller and less complex organisations may only need to establish a single safety committee.

Regardless of the number of subgroups, a safety committee's job usually includes:

- monitoring the effectiveness of the SMS
- making recommendations or decisions about safety policy and objectives
- ensuring timely responses in implementing necessary safety risk control actions
- monitoring effectiveness of safety risk mitigation strategies
- defining and monitoring safety performance indicators and setting safety performance targets for the organisation
- directing and monitoring the initial SMS implementation process
- reviewing safety performance and outcomes
- evaluating safety training and safety promotion effectiveness.



Image: Civil Aviation Safety Authority

The organisation understands that 'safety is everyone's responsibility'

Regardless of the organisation's size and complexity or the structure of your safety committees, all committee members should be appropriately trained in their roles, responsibilities and expectations as members of the safety committee. This training may be formal or informal, but goes beyond basic SMS awareness training and is designed to enhance the effectiveness of the safety committee, as all members understand the purpose and importance of the committee to the overall effectiveness of the SMS.

### Appointment of key safety personnel checklist

- ☐ There is a dedicated safety department, led by a head of safety management (large organisations).
- ☐ There is a separate safety manager, possibly with a small number of staff (medium organisations).
- ☐ There is a part-time safety officer (who is supported through appropriate safety training) who works with the accountable executive (small organisations).
- ☐ The safety manager has operational management experience and enough technical background to understand the systems that support operations (operational skills alone will not be sufficient).
- ☐ The safety manager has a sound understanding of safety management principles, typically acquired through formal training and practical experience.
- ☐ The role and responsibilities of the safety manager are specified in the SMS manual, as well as identified delegates to act on their behalf in their absence.
- ☐ The safety manager reports directly to senior management (ideally the accountable executive or CEO).
- ☐ The organisation recognises the safety manager is not the sole person responsible for safety. Specific safety activities and functional or operational safety performance are the responsibility of the relevant operational or functional managers. The safety manager monitors all cross-functional or departmental SMS activities to ensure appropriate integration.
- ☐ The safety manager is approachable, remains cool under pressure and has credibility with staff.
- ☐ Regardless of the size of the organisation, there is a safety committee that provides a forum for discussing safety issues and the overall health and direction of the SMS.
- ☐ Safety committee members are trained to understand the purpose of the SRB and SAG's roles within the SMS, and their membership roles and responsibilities.

## Safety objectives

The most effective SMS objectives are those that provide a call to action and develop commitment from, and engagement of, staff.

Safety objectives are broad directions that help to establish specific safety goals or desired targets for relevant aspects of your organisation's safety vision, senior management commitment, realistic safety milestones and desired results. You should make them clear and review them regularly.

Safety objectives should be **SMART** – in other words they should be:

- S** Specific
- M** Measurable
- A** Achievable
- R** Relevant
- T** Timely


Safety performance indicators (SPIs) and safety performance targets (SPTs) are needed to monitor the achievement of safety objectives and are further elaborated on in booklet 4: Safety Assurance.





### Safety objectives

1. To encourage reporting of all incidents, no matter how trivial they may seem (measure: 20 per cent increase in reporting for each of the next three years)
2. To build an accurate database of these incidents, and give feedback to staff within two weeks of the initial report
3. To set up a more formal rostering and reporting system, so that we can track and minimise fatigue-related mistakes. This system will consider limits on consecutive shifts, as well as the extra time required for task completion if a night shift is involved

A photograph of a small, white and blue propeller plane parked on a paved runway. In the foreground, a single orange traffic cone sits on the gravel shoulder. The background shows a clear blue sky and distant hills.

Ideally, your objectives should be grouped into short-, medium- and long-term objectives, which you will need to review periodically to ensure you are meeting targets, and that they are still relevant.

# Coordination of emergency response planning

An emergency response plan (ERP) is an integral part of your SMS, to be activated if there is an aviation-related emergency, crisis or event, such as an accident or major incident. The ERP sets out what you will do in the case of an emergency and importantly, how you return to normal operations. The ERP should address foreseeable emergencies as identified through the SMS and include mitigating actions, processes and controls to effectively manage aviation-related emergencies. It lists procedures for:

- orderly and efficient transition from normal to emergency operations
- delegation of emergency authority
- assignment of emergency responsibilities
- authorisation by key personnel for actions mandated by the plan
- coordination of efforts to handle the emergency
- safe continuation of operations, or return to normal operations, as soon as possible
- planned and coordinated action to manage and minimise the risks associated with an accident or incident.

Also consider the role of contractors and third parties in a remote airport emergency.

Your ERP should be documented and easily accessible to all appropriate key personnel, both within your organisation and for any external organisations that may need to be interfaced with during an emergency.

You can either document the ERP in a separate manual, incorporate it into your organisation's SMS manual, or a combination of both. As long as, in an emergency, key personnel know where to find emergency procedures information.

Emergency situations create unique pressures – they are complex and unfamiliar. Accident investigations consistently show how important regularly rehearsed emergency procedures and scheduled refresher training are in preventing or minimising harm.

Approved maintenance organisations' (AMO) ERPs must focus on events that can affect aircraft or components' flight safety.

AMO ERP scenarios should include, as required:

- emergency response to a major aircraft occurrence during maintenance, such as an oxygen fire, or major engine failure during a ground run
- response to requests for expert advice from aircraft or aerodrome operators during an occurrence
- response to requests for expert emergency aircraft recovery assistance from aircraft or aerodrome operators.

The ERP will be less involved for component maintenance organisations. A small component organisation's ERP might only include:

- quarantine of components or maintenance documents related to the occurrence
- where an AMO finds measurement tool(s) are out of calibration limits and urgently needs a documented and formally agreed process to inform operators of at-risk installed components.

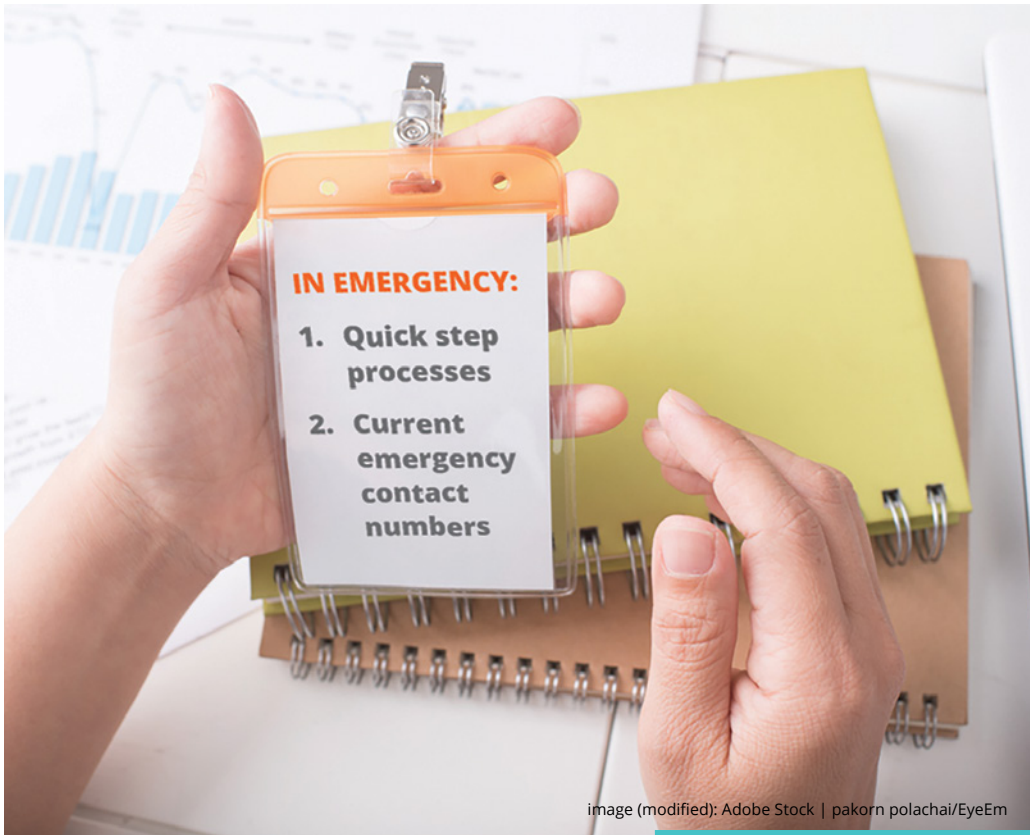


image (modified): Adobe Stock | pakorn polachai/EyeEm

Both aircraft and component maintenance organisations should also consider including personnel-related considerations in their ERP, such as:

- appropriate during and post-incident personal behaviours
- welfare and deployment of affected personnel immediately following a major occurrence.

You may find it effective to have relatively stable information (e.g. ERP policies, roles and responsibilities, succession plans, training requirements) in your SMS manual and put response information required immediately (e.g. procedures, checklists, phone numbers, locations) in separate, easily accessible booklets.

An ERP for a small, non-complex organisation may consist of a laminated lanyard card of quick step processes and current emergency contact numbers.

Doing periodic desk-top exercises, as well as live exercises where and when appropriate, will help to make sure your ERP works and is current. You should review your plan regularly and update it where necessary – having out-of-date contact details (e.g. for key emergency services and personnel) is the last thing you need in an emergency.

The more you prepare and test, the better you will be prepared in an emergency, and your communication and organisational coordination will also improve. Such exercises are also valuable for developing more effective relationships with local, state and federal agencies.

## An effective emergency response plan

For your ERP to be effective, you need to address some critical issues. Ensure you have:

- adequate training and competency arrangements
- well thought-out procedures (easily assessable, understood and applied)
- clear understanding of roles in emergency response situations
- clear lines of command and communication
- realistic expectations of people's abilities in an emergency
- prepared and practised for an emergency.

## Emergency response responsibilities for operators

The aircraft operator's ERP should be coordinated with the airport emergency plan, so both operator and airport management know who is responsible for what. As part of emergency response planning, aircraft and airport operators together must:

- provide training to prepare personnel for emergencies
- make arrangements to handle phone queries about the emergency
- designate a suitable holding area for uninjured people ('meeters and greeters')
- outline duties for company personnel (the person-in-command, receptionists for receiving passengers in holding areas)
- gather essential passenger information and ensure passengers' safety
- establish mutual support arrangements with other operators and agencies for an emergency
- prepare and maintain an emergency communications kit containing:
  - necessary administrative supplies, such as forms, paper, name tags, computers and laptops
  - critical telephone numbers and contact details, such as doctors, local hotels, translators, linguists, caterers, airline transport companies.



image (modified): Adobe Stock | phatthanit

### If there is an aircraft accident at or near the airport, operators should:

- report to the airport command post to coordinate the aircraft operator's activities
- assist in locating and recovering any flight recorders
- assist investigators to identify aircraft components and ensure that hazardous components are made safe
- provide passenger and flight crew information, as well as information about any dangerous goods on board
- transport uninjured people to the designated holding area
- make arrangements for any uninjured passengers who wish to continue their journey, or who may need accommodation or other assistance
- liaise with the airport public information officer and police, inform the media
- remove the aircraft (or wreckage) when the investigation authority authorises it.

### Emergency response plan checklist

- ☐ The SMS documents include an ERP, which can be activated in the event of a major occurrence.
- ☐ The ERP covers:
  - orderly and efficient transition from normal to emergency operations
  - delegation of emergency authority
  - assignment of emergency responsibilities
  - authorisation by key personnel for actions included in the plan
  - coordination of efforts to handle the emergency
  - safe continuation of operations, or return to normal operations, as soon as possible
  - planned and coordinated action to manage and minimise the risks associated with an emergency.
- ☐ The ERP is either documented in a separate manual or incorporated into the SMS manual.



# Documentation

One of the formal ways to communicate your safety approach effectively to all employees and third parties is through clear safety management documentation.

This safety documentation demonstrates to your managers, staff and third parties that you always conduct business based on safety management principles.

If your procedures are in separate manuals (as can happen in larger, more complex operations), you must make this clear, so your staff have simple, effective access to the detailed information about your safety management procedures. Where this does occur, appropriate, yet simple cross-referencing from your SMS manual to such documents is appropriate.

However, you need to ensure that, if cross-referencing to other documents or manuals, all personnel have access to such supporting documents so they can clearly understand the integration and day-to-day processes of the SMS.

Documentation should be adapted and written to address the day-to-day safety management activities of your organisation in a way that can be easily understood by personnel throughout the organisation. All SMS documents, be it a standalone SMS manual or cross-referenced documents and manuals, need to be kept up to date and monitored for cross-referencing and operational disparities before significant amendments are made.

One practical example of SMS documentation which can exist across various elements of your SMS is that of alcohol and drug (AOD) testing. Where you may document the need for AOD testing as a possible checklist or procedural requirement post the enactment of the ERP, or after an incident requiring safety reporting and investigation.



## Documentation checklist

- ☐ Safety management documentation means management can effectively communicate the organisation's approach to safety to the entire organisation.
- ☐ Key components and elements, as per the CASA SMS framework, are documented.
- ☐ The documentation reflects the intent and processes of the SMS.
- ☐ All documentation is updated to reflect any changes to the SMS.
- ☐ The SMS manual is concise and to the point.
- ☐ Information that changes regularly (e.g. names of personnel assigned specific safety responsibilities) is recorded in annexes and appendices at the back of the SMS manual.
- ☐ There is an internal, approved amendment process. Amendment and distribution of SMS documentation is controlled.
- ☐ There is a timetable for periodic review of all documentation.

## Minimum SMS components to be documented

The SMS manual should include detailed description of your SMS policy, process and procedures.

Component	Elements
Safety policy, objectives and planning	<ul style="list-style-type: none"> <li>• Management commitment and responsibility</li> <li>• Safety accountabilities and responsibilities</li> <li>• Appointment of key safety personnel</li> <li>• Coordination of emergency response planning</li> <li>• Documentation:*               <ul style="list-style-type: none"> <li>– describes the SMS</li> <li>– is regularly reviewed and updated</li> <li>– is available to all personnel</li> <li>– details where and how any other SMS-related records are kept</li> <li>– has a table of contents</li> </ul> </li> </ul>
Safety risk management	<ul style="list-style-type: none"> <li>• Hazard identification processes</li> <li>• Risk assessment and mitigation processes</li> </ul>
Safety assurance	<ul style="list-style-type: none"> <li>• Safety performance monitoring and measurement</li> <li>• Management of change</li> <li>• Continuous improvement of the SMS</li> </ul>
Safety promotion	<ul style="list-style-type: none"> <li>• Training and education</li> <li>• Safety communication</li> </ul>

\* The SMS manual is a working document. While there is a need for some policy statements, your manual should be largely procedural.



image: Civil Aviation Safety Authority

SMS documentation also includes the compilation and maintenance of operational records substantiating the existence and ongoing operation of the SMS. These are operational records that sit outside the SMS manual, evidencing outputs of the SMS processes and procedures, and typically include:

- hazard register and hazard (safety) reports
- SPI and SPT tracking
- completed safety risk assessments and risk registers
- SMS reviews and audit reports
- SMS and safety training records
- safety committee meeting minutes
- SMS gap analysis and implementation plan (during initial implementation).

### **SMS components you should document**

Your documentation should reflect the intent and processes of the SMS. Therefore, if you change your SMS, you will probably need to update your SMS manual.

To make it easy to use and understand, keep your SMS manual concise and to the point.

Any information you expect to change regularly (e.g. the names of personnel with specific safety responsibilities) should be presented as annexes or appendices at the back of your manual.

Above all, make sure that when you amend and distribute SMS documents, they are controlled. In other words, make sure that the approved person authorises them, they are distributed to all the places where they will be needed, and that old or obsolete versions are removed or replaced.

Guidance on language and layout of procedures and documentation as well as a sample document register can be found within the toolkit at the end of this booklet.

### **Contractor and third-party interfaces**

Third-party interfaces are often known as contractors within most organisations. However, in respect to an SMS, a third-party interface is any party that can influence your safety management. For example, at an airport, a refueller is a third party for both the airport and an aircraft operator, but would only be considered a contractor to the operator. Yet the refueller can influence both the airport and operator SMS.

As an aviation service provider, you will often employ contractors in areas such as refuelling, catering, ground handling, aircraft maintenance, crew training, flight planning and dispatch. These contractors will be referred to as 'third-party interfaces' in your SMS. You have probably always had contractual arrangements with your providers. Your SMS provides an opportunity (and an obligation) to extend these contractual arrangements to include safety performance. Your SMS documentation should outline how you will manage any risks posed by using third parties, as well as how you will ensure these providers are complying with your SMS policy and procedures.

While a contractor provides you with a service, you still hold overall responsibility for the safety of services they provide. The safety standards specified in your SMS must not be eroded by any products and services provided by external organisations. You do not want all your hard work in implementing an SMS to be undone through negative safety behaviours or actions of your contractors when they interact with your organisation or staff.

It is a good idea to investigate the third party's previous safety record thoroughly and establish whether they have ever breached any regulations. Simply asking around – talking to other organisations currently using their services, or who have used them in the past – will quickly give you a sense of how professional they are. Your positive safety culture can be disabled through contract staff actions either directly, via unsafe actions, or indirectly through negative safety behaviours observed by your own staff that are seen to go unmanaged.

It is also important to take the time to explain to the contractor all about your SMS, and particularly what they need to do under it. When you are deciding about using their services, whether they are willing to comply with your SMS is as important as factors such as price, quality and on-time delivery. The following minimum standards should apply when engaging third-party contractors:

- Any agreement for the provision of services should be supported by a written contract before these services commence.
- All third-party providers should hold the appropriate qualifications, credentials or approvals for the work being carried out.
- All third parties should understand your SMS, and their responsibilities within it. This would include ensuring they have been trained in your SMS policy, processes, and acceptable versus unacceptable safety behaviours.
- Where possible, the organisation should provide SMS induction training for all third-party services providers.
- All third-party organisations should be able to demonstrate their ability to provide trained and competent staff (training may be provided by your organisation, where relevant).
- All written service level agreements should contain a schedule of oversight to monitor the third party's safety performance on a regular basis.
- All agreements should detail how any noted safety hazards and deficiencies will be addressed, and the time frame in which to do this, as well as how third-party contracted staff can report any identified safety hazards to you for inclusion in your SMS when they are providing you with a service.
- Where a service being provided is CASA-licensed or certified, the written agreement should require the third party to advise you, as the contracting organisation, of any CASA regulatory action that may affect their ability to provide the required services.

All safety issues and risks associated with third-party interfaces should be documented and made accessible to each party involved for sharing and review. This allows for the sharing of lessons learned and pooling of safety information that will be valuable to both parties. Safety benefits can be achieved through an enhancement of safety reached by each party through a shared ownership of safety risks and responsibilities.

### **Contractor and third-party interface documentation checklist**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Contracts or service level agreements specify the safety standards to be met, including any unacceptable safety behaviours that will not be tolerated.</li> <li><input type="checkbox"/> There are provisions to ensure contractors comply with the prescribed safety standards.</li> <li><input type="checkbox"/> Processes and checks ensure the level of safety is not adversely affected by services and supplies provided by external organisations.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> The previous safety record of, and any regulatory breaches by, the third party are considered before engagement.</li> <li><input type="checkbox"/> Contractors and third-party providers are inducted into your SMS and understand their responsibilities within it, including training and any safety briefings needed when working on site or with your equipment.</li> </ul> |
|--|---|





image: Civil Aviation Safety Authority

## Outcomes-based and PSOE considerations

To move from compliance-based safety policy and objectives to become outcomes-based, organisations cannot simply document the elements of this component. Instead, you need to consider how your documented elements will actually be displayed, monitored and evidenced as being a live safety management process.

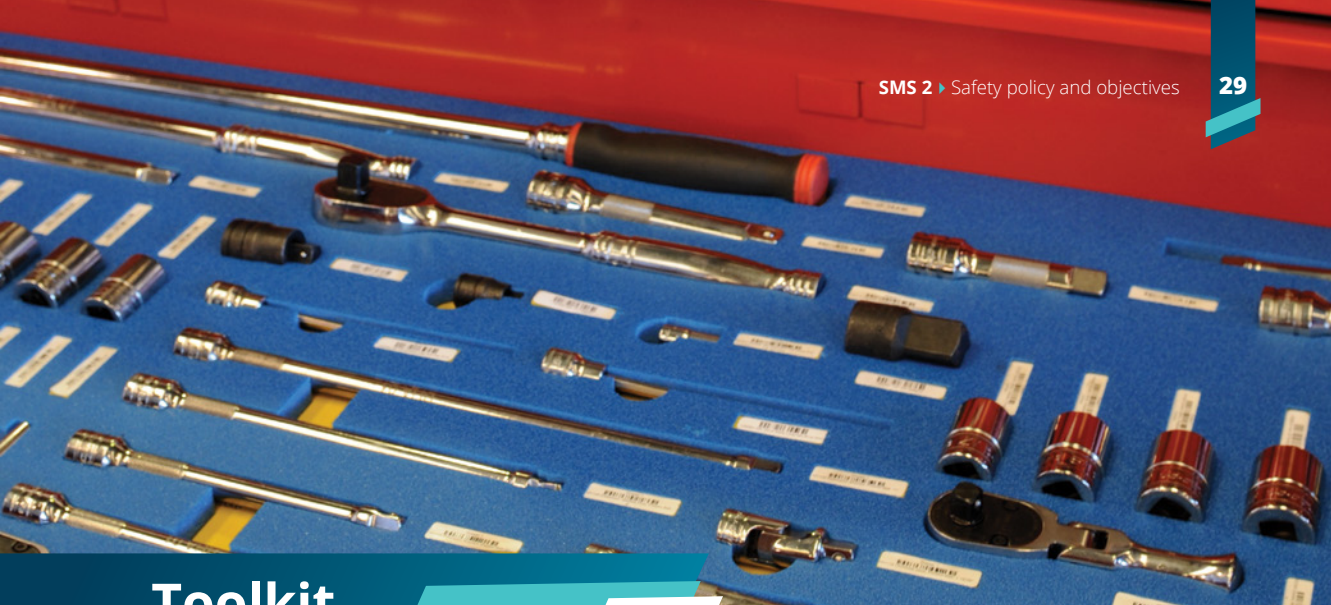
For example, having the CEO sign the safety policy is a compliance-based management commitment, but having the CEO demonstrate management commitment through the allocation of appropriate resourcing (personnel, time and money) for the implementation and maintenance of the SMS, and ensuring that safety briefings or toolbox talks are occurring and are imparting relevant knowledge, is an outcomes-based commitment. You could consider this as ‘walking the talk’ as opposed to ‘ticking the box’ when it comes to safety management.

As your SMS moves from implementation, to operational and through to maturing, the Present, Suitable, Operating and Effective (PSOE) evaluation of your SMS policy and objectives should also naturally shift, as shown in the examples below.

Element – management commitment				
Evaluation				
Implementing	Present	Suitable	Operating	Effective
Safety policy outlining key personnel is under development, with supporting resources for implementation still being allocated or recruited.	There is a safety policy, signed by the accountable manager, which includes a commitment to continuous improvement	There is a process for assessing resources and addressing any shortfalls.	The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls.	The organisation actively reviews and acts to address any forecast shortfalls in resources.

Element – safety objectives				
Evaluation				
Implementing	Present	Suitable	Operating	Effective
Some key industry objectives have been identified that are relevant to the organisation for inclusion.	Objectives have been established that are consistent with the safety policy.	The safety objectives are relevant to the organisation and its activities.	Safety objectives are regularly reviewed and communicated across the organisation	Achievement of the safety objectives are monitored, and action taken to ensure they are being met

See booklet 8: SMS Resources Kit for a copy of the full SMS evaluation tool to assist with evaluating this component of your SMS using PSOE.



## Toolkit

image: Civil Aviation Safety Authority

## Booklet 2 – Safety policy and objectives

This toolkit contains the following:

- ☐ Toolkit purpose and use
- ☐ Positive safety culture: enablers and disablers
- ☐ Sample safety leadership rules
- ☐ Safety policy statement examples
- ☐ Safety manager: job description example
- ☐ Sample safety committee terms of reference
- ☐ Guidance for language and layout of procedures and documentation
- ☐ Document register example
- ☐ Case study: Aviation Safety Lifesavers Policy
  - Appendix A – Workflow process for applying the healthy safety culture procedure
  - Appendix B – Bush Aviation counselling/discipline decision chart

### Toolkit purpose and use

Contained within the following toolkit are examples of ways an organisation can develop certain elements within the safety policy and objectives component of an SMS. These are examples only to assist in building overall SMS knowledge, being compiled from various sources, and are in no way a CASA recommendation regarding templates or standards to meet regulatory compliance.

### Positive safety culture: enablers and disablers

Management and employee actions can help drive safety culture to be more positive.

The below table provides examples of the types of actions that will enable or disable a positive safety culture in an organisation.

Safety culture element	Positive safety culture	
	Enablers	Disablers
<p><b>Commitment to safety</b></p> <p>Reflects the extent to which senior management within the organisation has a positive attitude towards safety and recognises its importance. Senior management should be genuinely committed to achieving and maintaining a high level of safety and give employees motivation and the means to do so also</p>	<ul style="list-style-type: none"> <li>• Management leads safety culture and is actively motivating its employees to care for safety, not only by talking but by acting as role models.</li> <li>• Management provides resources for a range of safety-related tasks (e.g. training).</li> <li>• Continuous safety management oversight and governance are established.</li> </ul>	<ul style="list-style-type: none"> <li>• Management is actively demonstrating that profit, cost reduction and efficiency come first.</li> <li>• Investments to improve safety are often made when required by regulations or after accidents.</li> <li>• Neither oversight nor governance regarding safety management is established.</li> </ul>
<p><b>Adaptability</b></p> <p>Reflects the extent to which employees and management are willing to learn from past experiences and are able to take action necessary in order to enhance the level of safety within the organisation.</p>	<ul style="list-style-type: none"> <li>• Employee input is actively encouraged when addressing safety issues.</li> <li>• All incidents and audit findings are investigated and acted upon.</li> <li>• Organisational processes and procedures are questioned for their safety impact (i.e. high extent of self-criticism).</li> <li>• A clear proactive approach to safety is demonstrated and followed.</li> </ul>	<ul style="list-style-type: none"> <li>• Employee input on safety issues is not sought from all levels of employees.</li> <li>• Actions are often taken only after accidents or when required by regulations.</li> <li>• Organisational processes and procedures are considered adequate as long as no accident occurs (complacency or lack of self-criticism).</li> <li>• Even when an accident or incident occurs, the organisation is unwilling to question itself or internal processes.</li> <li>• A reactive approach to safety is demonstrated and followed.</li> </ul>

Safety culture element	Positive safety culture	
	Enablers	Disablers
<p><b>Awareness</b></p> <p>Reflects the extent to which employees and management are aware of the aviation risks faced by the organisation and its activities.</p> <p>Employees and management should be constantly maintaining a high degree of vigilance with respect to safety issues.</p>	<ul style="list-style-type: none"> <li>• An effective method of hazard identification has been established.</li> <li>• Investigations seek to establish the root cause and not assign blame to individuals.</li> <li>• The organisation stays abreast of important safety improvements and adapts itself accordingly.</li> <li>• The organisation systematically evaluates whether safety improvements are implemented and working as intended.</li> <li>• Where appropriate, members of the organisation are well aware of the safety risks induced by their individual actions and company operations and activities.</li> </ul>	<ul style="list-style-type: none"> <li>• No effort is spent on hazard identification.</li> <li>• Investigations stop at the first viable cause rather than seeking the root cause.</li> <li>• The organisation does not stay abreast of important safety improvements.</li> <li>• The organisation does not evaluate whether safety improvements are implemented properly.</li> <li>• Members of the organisation are not aware of the safety risks induced by their individual actions and company operations.</li> <li>• Safety data is gathered but not analysed or acted upon.</li> </ul>

Safety culture element	Positive safety culture	
	Enablers	Disablers
<p><b>Behaviour with respect to safety</b></p> <p>Reflects the extent to which every level of the organisation behaves such as to maintain and improve the level of safety. The importance of safety should be recognised, and processes and procedures needed to maintain it should be put in place.</p>	<ul style="list-style-type: none"> <li>• The employees motivate themselves to act safely and by acting as role models.</li> <li>• Continuous monitoring of safe behaviour is practised.</li> <li>• Intentional unsafe behaviour is not tolerated by management or colleagues.</li> <li>• The working conditions support aviation safety at all times.</li> </ul>	<ul style="list-style-type: none"> <li>• Employees are not punished for intentional unsafe behaviour to the benefits of their own or other interests.</li> <li>• The working conditions provoke behaviour and work arounds that are detrimental to aviation safety.</li> <li>• No monitoring of aviation safety within the organisation is practised.</li> <li>• Constructive criticism and feedback to the benefit of aviation safety is not welcomed.</li> </ul>
<p><b>Information</b></p> <p>Reflects the extent to which information is distributed to all necessary people within the organisation.</p> <p>Employees should be enabled and encouraged to report aviation safety concerns and receive feedback on their reports.</p> <p>Work information related to aviation safety has to be communicated meaningfully to the right people to avoid miscommunication that could lead to hazardous aviation system situations and consequences.</p>	<ul style="list-style-type: none"> <li>• An open and just safety reporting environment exists.</li> <li>• Employees are provided with safety-relevant information in a timely manner to allow for safe operations or decisions to be made.</li> <li>• Management and supervisors regularly check whether safety relevant information is understood and acted upon.</li> <li>• Knowledge transfer and training regarding aviation safety is actively practised (e.g. sharing of lessons learned).</li> </ul>	<ul style="list-style-type: none"> <li>• A blaming safety reporting environment is evident.</li> <li>• Safety-relevant information is withheld.</li> <li>• Safety communication is not monitored for its effectiveness.</li> <li>• No knowledge transfer or training is provided.</li> </ul>



Safety culture element	Positive safety culture	
	Enablers	Disablers
<p><b>Trust</b></p> <p>Employee contribution to safety thrives in a reporting environment that fosters trust – trust that their actions or omissions, commensurate with their training and experience, will not be punished. A workable approach is to apply a reasonableness test – i.e. is it reasonable that a person with the same level of experience and training might do the same thing? Such an environment is fundamental to effective and efficient safety reporting.</p> <p>Effective safety reporting systems help to ensure that people are willing to report their errors and experiences, so that organisations have access to relevant data and information that is necessary to address existing and potential safety deficiencies and hazards. These systems create an environment in which people can be confident that safety data and safety information will be used exclusively for improving safety.</p>	<ul style="list-style-type: none"> <li>• There is a distinction between acceptable and unacceptable behaviour, which is known to all employees.</li> <li>• Investigations of occurrences (including accidents and incidents) consider individual as well as organisational factors.</li> <li>• Good aviation safety performance is recognised and rewarded on a regular basis.</li> <li>• There is willingness among employees and operational personnel to report events in which they have been involved.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no identifiable distinction between acceptable and unacceptable behaviour.</li> <li>• Employees are systematically and rigorously punished for human errors.</li> <li>• Accident and occurrence investigations focus on individual factors only.</li> <li>• Good safety performance and safe behaviour is taken for granted.</li> </ul>

Source: ICAO Safety Management Manual Doc. 9859

## Sample safety leadership rules

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- ☐ I will never walk past, or ignore, an unsafe act or unsafe behaviour.
- ☐ I will ensure that my people are using task risk assessments to manage hazards effectively.
- ☐ I will ensure all personnel, including new starters and contractors, are familiar with existing safety systems and procedures, including the tools for risk assessment.
- ☐ I will verify that housekeeping and hazard inspections are done as required and will rectify all identified issues immediately.
- ☐ I will do at least one safety observation per week.
- ☐ I will communicate all site incidents and safety investigation reports and immediately rectify all issues within my control.
- ☐ I will ensure that no staff are asked to do a task that they are not competent to perform in a safe manner.
- ☐ I will ensure daily and monthly safety meetings take place with all my people, including a weekly safety toolbox talk.
- ☐ I will ensure issues raised in daily and monthly safety meetings are recorded and followed up on, and feedback is given in a timely manner.
- ☐ I will ensure that we thoroughly investigate all incidents and injuries, take action on the findings, and close them out in the aviation safety database, in a timely manner.
- ☐ I commit to ensuring there is no distinction between casual employees, contractors and permanent employees in the treatment and communication of safety matters.
- ☐ I will be absolutely impartial in dealing with safety issues and apply the 'just culture' process to all incidents.

I, \_\_\_\_\_, agree to live and work by these rules while I am working at XXXXXX and to be a safety role model.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## Safety policy statement examples

### Safety policy statement #1

Safety is one of our core business functions. We are committed to developing, implementing, maintaining and constantly improving strategies and processes to ensure that all our aviation activities take place under a balanced allocation of organisational resources, aimed at achieving the highest level of safety performance and meeting national and international standards, while delivering our services.

All levels of management and employees are accountable for the delivery of this highest level of safety performance, starting with the [chief executive officer (CEO) / managing director / or as appropriate to the organisation].

#### Our commitment is to:

- support the management of safety by providing appropriate resources to build an organisational culture that fosters safe practices, encourages effective safety reporting and communication, and actively manages safety with the same attention given to results as the other management systems of the organisation
- enforce the management of safety as a primary responsibility of all managers and employees
- clearly define for staff, managers and employees their accountabilities and responsibilities for the delivery of the organisation's safety performance and the performance of our safety management system
- establish and operate hazard identification and risk management processes, including a hazard reporting system, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is as low as reasonably practicable (ALARP)
- ensure that no action will be taken against any employee who discloses a safety concern through the hazard reporting system, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or wilful disregard of regulations or procedures
- comply with and, wherever possible, exceed legislative and regulatory requirements and standards
- ensure there are enough people skilled and trained available to implement safety strategies and processes
- ensure that staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters, and are only allocated tasks in line with their skills
- establish and measure our safety performance against realistic safety performance indicators and safety performance targets
- continually improve our safety performance through management processes that ensure relevant safety action is taken and is effective
- ensure externally supplied systems and services to support our operations are delivered and meet our safety performance standards.

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(Signed)  
CEO / Managing Director / or as appropriate

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## Safety policy statement #2

Safety is the first priority in all our activities. We are committed to implementing, developing and improving strategies, management systems and processes to ensure that all our aviation activities uphold the highest level of safety performance and meet national and international standards.

### **Our commitment is to:**

- develop and embed a safety culture in all our aviation activities – one that recognises the value of effective safety management and acknowledges that safety is paramount
- clearly define all personnel's accountabilities and responsibilities for developing and delivering aviation safety strategy and performance
- minimise the risks associated with aircraft operations to a point that is as low as reasonably practicable
- ensure that externally supplied systems and services affecting the safety of our operations meet appropriate safety standards
- develop and improve our safety processes to conform to world-class standards
- comply with, and, wherever possible, exceed legislative and regulatory requirements and standards
- ensure that all staff have adequate and appropriate aviation safety information and training, are competent in safety matters, and are only allocated tasks in line with their skills
- ensure there are enough skilled and trained personnel to implement safety strategy and policy
- establish and measure our safety performance against realistic objectives and targets
- achieve the highest levels of safety standards and performance in all our aviation activities
- continually improve our safety performance
- conduct safety and management reviews and ensure we take relevant action
- ensure that an effective SMS is integral to all our aviation activities.

## Safety policy statement #3

Management is committed to providing safe, healthy, secure work conditions and fostering positive safety attitudes. The organisation's owner / CEO is committed to:

- ongoing pursuit of an accident-free workplace, including no harm to people and no damage to equipment, the environment or property
- a culture of open reporting of all safety hazards
- an open reporting culture in which management will not initiate disciplinary action against any personnel who, in good faith, disclose a hazard or safety occurrence resulting from unintentional conduct
- supporting effective communication throughout the organisation
- support for safety training and awareness programs
- conducting regular audits of safety policies, procedures and practices
- monitoring industry activity to ensure best safety practices are incorporated into the organisation
- providing the necessary resources to support this policy
- requiring all employees to maintain a safe work environment through adherence to approved policies, procedures and training; and familiarising themselves (and complying) with safety policies and procedures
- all levels of management, starting with organisation's owner / CEO, being accountable for safety performance. To be a good leader, you must be a good safety leader
- the principle that the organisation is strengthened by making safety excellence an integral part of all activities



image: Civil Aviation Safety Authority

## Safety manager: job description example

### 1. Overall purpose

The safety manager is responsible for providing guidance and direction for the planning, implementation and operation of the organisation's safety management system (SMS).

### 2. Key roles

#### Safety advocate

Demonstrates excellent safety behaviour and attitude, follows regulatory practices and rules, recognises and reports hazards, and promotes effective safety reporting.

#### Leader

Models and promotes an organisational culture that fosters safety practices through effective leadership.

#### Communicator

Promotes two-way communication: brings safety issues to the attention of management, and delivers safety information to the organisation's staff, contractors and stakeholders.

Provides and articulates information regarding safety issues within the organisation.

#### Developer

Assists in the continuous improvement of hazard identification, safety risk assessment and the organisation's SMS.

#### Relationship builder

Builds and maintains an excellent working relationship with the organisation's safety action group (SAG) or safety committee (in a small, non-complex organisation) and across the organisation.

#### Ambassador

Represents the organisation in government and industry activities.

#### Analyst

Analyses technical data for trends relating to hazards, events and occurrences.

#### Process manager

Effectively utilises applicable processes and procedures to fulfil roles and responsibilities.

Investigates opportunities to increase the efficiency of processes.

Measures the effectiveness of processes and seeks to continually improve their quality.

### 3. Responsibilities

These responsibilities will include, but not be limited to:

- managing the audit program and performing a gap analysis
- operation of the safety committee
- managing the investigation of incidents
- maintaining the hazard register
- developing and maintaining the SMS training and promotional activities
- day-to-day operation of the SMS.

### 4. Nature and scope

The safety manager must interact with operational personnel, senior managers and departmental heads throughout the organisation.

[For smaller, non-complex organisations: The safety manager must communicate effectively with all staff in the organisation.]

The safety manager should also foster positive relationships with regulatory authorities, agencies and outside organisations. Other contacts will be established at a working level as appropriate.



## 5. Qualifications

Attributes and qualifications include:

- broad operational knowledge and experience in the functions of the organisation (e.g. training management, aircraft operations, air traffic management, aerodrome operations and maintenance organisation management)
- sound knowledge of safety management principles and practices, preferably with completion of a recognised SMS course (e.g. investigator's course)
- an understanding of human factors and human performance principles
- good written and verbal communication skills
- responsibility for providing information and advice to senior management and to the accountable manager on matters relating to safe operations. Tact, diplomacy and a high degree of integrity are prerequisites
- computer literacy
- ability to relate to people at all levels, both inside and outside the organisation
- ability to cope with changing circumstances and situations with little supervision. The safety manager acts independently of other managers within the organisation
- good analytical skills
- leadership skills and an authoritative approach
- being worthy of respect from peers and management.

## 6. Authority

The manager has the following authorities:

- direct access to the accountable executive and appropriate senior and middle management on safety matters
- to conduct safety audits, surveys and inspections of any aspect of the operation, and direct other areas to provide information
- to conduct investigations of internal safety events in accordance with the procedures specified in the organisation's safety management systems manual
- to liaise with regulatory authorities on behalf of the organisation.



image: Civil Aviation Safety Authority

## Sample safety committee terms of reference

Safety committees should focus on action, as opposed to talk. The safety committee's role includes:

- acting as a source of safety expertise and advice for senior management
- reviewing progress on hazards identified and mitigating actions taken
- making safety recommendations to address safety hazards
- reviewing internal safety audit reports and investigation reports
- reviewing and approving the audit response and any resulting actions
- encouraging lateral thinking about safety issues
- helping to identify hazards, and defences and controls
- preparing and reviewing safety reports to be presented to the CEO
- reviewing progress against
  - safety objectives
  - safety performance indicators
  - safety performance targets.

The safety committee does not have the authority to direct individual departments, as this would interfere with the formal lines of authority. Rather, it makes recommendations for action by the responsible managers. Responsible managers are required to report back to the safety committee on progress of risk mitigation implementation and effectiveness monitoring, thus ensuring that corrective actions are taken in a timely manner and monitored for ongoing effectiveness

[In a smaller, non-complex organisation, the reporting line would be much simpler, with the safety manager and the CEO both members of the safety committee.]

### Chair – safety committee

The senior manager, or the safety manager, can chair the meetings.

### Minutes and agenda

- **Minutes:** all committee meetings are minuted. As soon as possible after the meeting, each committee member should receive a copy of the minutes with a clear indication of actions and timelines for completion. Copies of the minutes should be displayed on the safety notice board for employees.
- **Agenda:** a committee member, usually the safety manager, drafts the agenda after adequate notice of any discussion items. The safety manager will typically distribute the agenda one week before the meeting.

A typical agenda might include some or all the following items:

- review outstanding issues from previous meetings
- review safety action plans
- review safety investigation reports
- review the effectiveness of previous safety recommendations
- notify members of committee activities
- assess and resolve identified hazards
- review safety audits and action plans
- monitor and promote safety involvement
- monitor SPIs and SPT tracking
- carry out risk assessments on any new equipment, routes or procedures
- plan and organise staff training
- plan for the safety impact of operational changes.

### Frequency of safety committee meetings

The committee will aim to meet monthly.

[How often your committee meets depends on the size of your organisation and the number and severity of identified hazards. Some safety committees will meet weekly, while others will need to meet less frequently (e.g. once every two months).]



image: Civil Aviation Safety Authority

## Guidance for language and layout of procedures and documentation

When drawing up procedures, you should ensure that you:

- use terms the users will know
- include a glossary of terms and abbreviations (use the term in full the first time it is mentioned with its abbreviation, and then the abbreviation can subsequently be used on its own). However, be wary of over-use of abbreviations and jargon – in many cases they do not help understanding, and can often confuse rather than clarify
- use short sentences
- write 'actively' (e.g. 'train the appropriate personnel' rather than 'the appropriate personnel should be trained')
- are clear and concise
- set out actions in the right order
- emphasise any hazards, precautions or warnings with bold text or other highlighting
- avoid negatives where possible (e.g. 'wait until the person is competent, then assign responsibilities' rather than 'do not assign responsibilities if competency has not been assured')
- include visual aids for keeping track of where the reader is (e.g. tick boxes, markers), especially if the document is long
- avoid complicated or ambiguous language, jargon and buzzwords
- limit use of flow charts or diagrams if they over-complicate simple written procedures
- avoid using different terms for the same thing.

When producing SMS documentation (both procedural and technical), you should take the following into account.

- **Accuracy**

- Your procedures and documents must be accurate, using, for example, correct location names and task sequences.

- **Consistency**

- Use the same layout, language, font etc. for each procedure, job card and technical document. Comply with established conventions (see below) and stick to established design guidelines. Having consistent procedures and documents is good human factors practice because it reduces ambiguity and uncertainty.

- **Convention**

- A convention is an agreed upon way of doing things. Having a convention such as simplified technical English, or plain English, makes documents and procedures easier to understand. Conventions also ensure that what is learned in one task card, for example, can be transferred to any other, without the error-prone process of ‘unlearning’.

- **Feed forward / communicate widely**

- Although this term is used frequently in aviation maintenance, ‘feed outward’ might be more accurate. Feeding forward means communicating the lessons personnel learn on the job more widely. If someone identifies an easier, more effective way of doing something, then (subject to appropriate approvals) share this information or method with others.

- **Template**

- A template is a formatted outline into which procedure writers place information for specific tasks. A template typically contains sections with formatting, font types, indentation rules etc.

- **Validation**

- A valid procedure has been tested and shown to work properly in the real world. It is quite possible to write a procedure that cannot actually be performed in any operations for which it was intended. That is why you must make sure your procedures are valid and work.

- **Verification**

- A verified procedure has been checked for accuracy and completeness. Verifying a procedure does not mean it can actually be performed (see validation), but it does at least contain all the material it is supposed to, and that material is accurate. This can also be considered as assessing the procedure as intended versus how personnel on the front-line actually perform the task (work as imagined vs work as performed).





## Aviation Safety Lifesavers Policy



### Purpose

All personnel of Bush Aviation have a responsibility to themselves, their family and work colleagues to work safely. Accordingly, Bush Aviation has developed a set of non-negotiable aviation safety rules for all personnel.

This set of aviation safety rules, called lifesavers, is based on incident management system data, and developed in consultation with managers and employee representatives. The objective is to target and reinforce crucial behaviours and processes that ensure safety performance, particularly in high-risk areas of the business.

Aviation safety lifesavers are rules that, if broken, will cause serious safety breaches. If these rules are not followed, there is the potential for serious injury to employees, contractors or members of the general public, and even for fatalities.

### Scope

This procedure, defining Bush Aviation's aviation safety lifesavers, applies to all personnel.

### Responsibility

All employees and contractors working for Bush Aviation and its associated operations must adhere to the aviation safety lifesavers.

Lifesavers are Bush Aviation's standards for safeguarding safety and are key controls and procedures.

All managers and supervisors must ensure that all personnel know, understand and apply these principles when working for Bush Aviation. New employees and contractors will be familiarised with the standards in their induction programs and site-based safety training.

### Consequences of non-compliance

All personnel must work to comply with the aviation safety lifesavers. Where someone is in breach of the lifesavers, an investigation will be conducted, and disciplinary action may be taken. This action will be in accordance with the Bush Aviation Positive Safety Culture Procedure, BA-AS-05

## LIFESAVERS...

### Your safety depends on them!

1. Only operate equipment for which you are trained, competent and authorised.
2. Only commence a task after all appropriate permits or authorisations are in place.
3. Always speak up if standard operating procedures are not followed. Do not stand by and accept poor work standards.
4. Always report incidents to ensure a good learning culture.
5. Always use the appropriate personal protective equipment when working around aircraft.
6. Report any hazards you notice in your workplace.

## Positive safety culture procedure BA-AS-05

**Responsible Officer:** Aviation Safety Manager

**Approved:** CEO

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### Version history

Revision	Description	Originator	Date
<b>H</b>	Draft - Issued for implementation	J Mathers	24.08.13
<b>G</b>	Draft - Changes following review by staff representatives.	J Mathers	18.08.13
<b>B</b>	Draft - Review and amendments by CEO	J Mathers	16.07. 13
<b>A</b>	Draft	J Mathers	25.06. 13



image: Civil Aviation Safety Authority

## 1. Purpose

The purpose of this procedure is to provide Bush Aviation staff with guidance on:

- the application of safety culture procedures to incident management
- the management of incidents, near-misses, hazards and risks involving people
- Bush Aviation's commitment to a positive safety culture approach that complements our values, and the sustained delivery of a healthy safety culture
- the recognition that exceptional or above-and-beyond team and individual safety performance should be acknowledged and rewarded.

## 2. Scope

This procedure applies to all personnel across all Bush Aviation workplaces.

It does not provide detailed advice regarding the disciplinary process, but it will be used in conjunction with existing company discipline procedures.

The positive safety culture procedure will also be integral to management processes following incident investigations, primarily where the contributing factors involve human error.

### 3. Responsibilities

#### 3.1 Chief executive officer

The CEO is responsible for:

- implementing this procedure
- providing sufficient resources to act upon this procedure
- leading and modelling the positive safety culture process.

#### 3.2 Managers

Managers are responsible for ensuring all employees and contractors comply with this procedure by:

- leading and modelling the positive safety culture process
- periodically reviewing the process (if used) and reporting monthly on its effectiveness and application
- providing appropriate training and support to all personnel in applying this procedure.

#### 3.3 Safety manager

The safety manager:

- assists managers to implement and maintain this procedure
- promotes and models the positive safety culture procedure
- audits periodically to ensure the implementation of, and adherence to, this procedure
- coordinates management level training and awareness about applying the procedure
- compiles and distributes statistics relating to its effectiveness and application.

#### 3.4 Employees

Employees will:

- comply with the requirements of this procedure
- attend appropriate training and awareness sessions, as directed by their manager.

#### 3.5 Contractors

Contractors will comply with the requirements of this procedure.

## 4. Application

### 4.1 Commitment to a healthy safety culture

A healthy safety culture is applied knowing that:

- people make mistakes
- people may develop unhealthy patterns of behaviour
- there is zero tolerance of reckless conduct
- people must be recognised and rewarded for doing a good job and promoting sound work practices on an ongoing basis.

If there is an incident, near-miss or identified risk to safety, the healthy safety culture approach creates an alternative to the two extremes of punitive or blame-free cultures. A healthy safety culture balances the need to have a non-punitive reporting and learning environment (an environment that is not focused on attributing blame and administering punishment), with the need to hold people accountable for their actions.

A healthy safety culture is an important part of a positive health and safety culture. It recognises behaviours may fall below expectation. However, the employee may not necessarily be in the wrong or be acting in a wilfully reckless nature.

A healthy safety culture:

- focuses attention predominantly on identifying and addressing the system factors (root causes) that affect reliability and performance
- provides an atmosphere of trust in which people are encouraged to provide essential safety-related information (e.g. incident, hazard and near-miss reports) and build a healthy reporting culture
- clearly defines where the line is drawn between acceptable and unacceptable behaviour (see also the Bush Aviation Procedure for Aviation Safety Lifesavers BA-AS-06).

### 4.2 Healthy safety culture application

To ensure the development and sustainability of the high trust levels necessary to create a healthy safety culture at Bush Aviation, managers will apply these principles in a consistent manner. An incident does not always trigger the use of this process.

The healthy safety culture procedure should only apply:

- following a systemic investigation into an incident, event or exceptional behaviour
- after factual information or data has been collected from a thorough investigation. Investigations should focus predominantly on identifying and addressing systemic (organisational) contributing factors and related causes.

Following the investigation of an incident, event or exceptional behaviour, managers should consult the workflow process in Appendix A to guide their approach. This workflow process provides a step-by-step approach to using the 'just culture' decision chart in Appendix B. This procedure cannot incorporate every possible scenario or situation; however, it will help managers and leaders to consider a broad range of issues, so the final decision is consistent with company values, and with the sense of fairness and justice that ultimately leads to achieving safe operations.



image: Civil Aviation Safety Authority

### 4.3 Training

Managers, employees, aviation safety personnel and contractors (where necessary) will undergo 'just culture' training to ensure quality and consistency in using the model in the organisation. This training covers:

- human factors and human performance principles
- systemic health and safety incident investigation process (Incident Management BA-IM-01)
- background to, and rationale for, healthy safety culture principles
- sample case studies on how to apply the procedure
- explanation of linkages to other procedures such as:
  - aviation safety lifesavers, BA-AS-06
  - counselling, discipline and dismissal, BA-HR-01.

### 4.4 Record keeping and documentation

Where the counselling discipline decision chart is used, the accountable manager will ensure relevant actions are recorded on the incident management database or on the employee's file (only if discipline is taken). Use the decision chart detailed in Appendix B as a guide, ticking the appropriate box to verify what action you have taken.

This process will follow the procedure for counselling, discipline and dismissal (BA-HR-01), including privacy and confidentiality requirements, and use the appropriate form for that procedure, such as the pro-forma counselling and disciplinary interview forms.

The relevant site and industrial instrument practices will apply to records held on file.



## 5. Definitions

<b>At-risk behaviour (unintentional)</b>	The action increases the risk of an accident.
<b>Aviation safety lifesavers</b>	Fundamental safety rules to ensure a safe workplace. A breach of any of these rules will result in disciplinary action.
<b>Blame-free</b>	Not deserving of discipline or punitive action.
<b>Culpable</b>	Deserving of discipline or punitive action.
<b>Healthy safety culture</b>	<p>Healthy safety culture is about understanding and effectively applying human factors principles, and clearly defining acceptable and unacceptable (culpable) behaviour to ensure:</p> <ul style="list-style-type: none"> <li>• incidents that result from honest mistakes and failures in human reliability are not punished but acknowledged as organisational failures</li> <li>• zero tolerance for reckless actions and violations, which are treated appropriately</li> <li>• ongoing support for reporting and learning as the basis of a healthy safety culture</li> <li>• continuous improvement to reach, and then sustain, our safety performance objectives.</li> </ul>
<b>Highly culpable behaviour</b>	Conscious disregard of a substantial and unjustifiable risk.
<b>Human factors</b>	A field of scientific knowledge that involves optimising the relationship between the human operator and the environment.
<b>Human error</b>	Occasions in which a planned sequence of mental or physical activity fails to achieve its intended outcome.
<b>Punitive</b>	Intended to inflict punishment.
<b>Reckless (intentional)</b>	Risk-taking, where the action constituted a significant and unjustifiable risk, and there was a conscious disregard of consequences.
<b>Should</b>	Recommended, but not mandatory.
<b>Will</b>	Understood as mandatory.



image: Civil Aviation Safety Authority

## 6. Reference documentation

- Bush Aviation Safety Policy
- Bush Aviation Procedure for Aviation Safety Lifesavers, BA-AS-06
- Bush Aviation Procedures for Incident Management, BA-IM-01
- Bush Aviation Counselling/Discipline & Decision Chart BA-HR-01

Errors: A balance between learning and accountability. Marx, David. Outcome Engineering (2004)

Managing the risks of organisational accidents, Reason J. Ashgate, Brookfield (1997)

# Appendix A

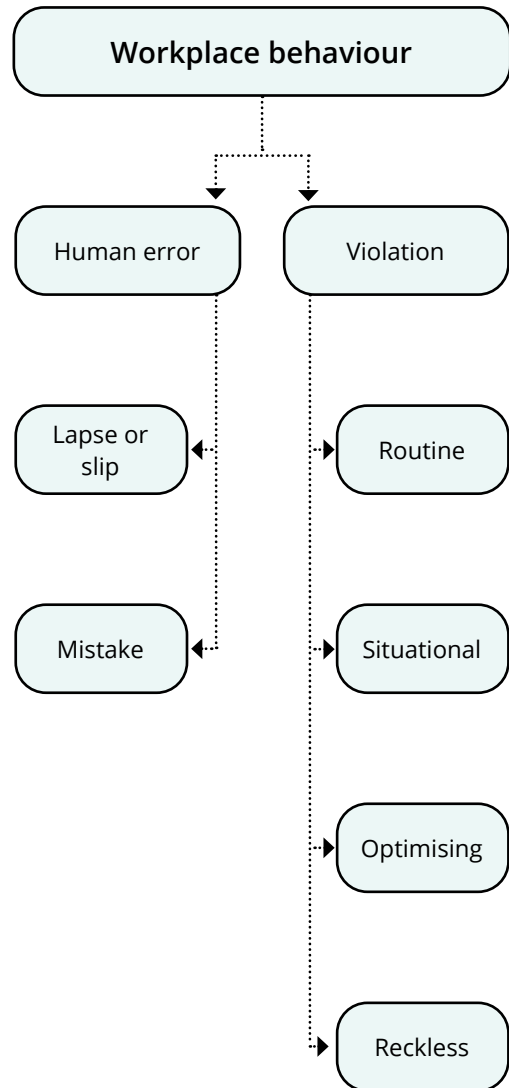
## Workflow process for applying the healthy safety culture procedure

### Understanding workplace behaviour

Human error is a part of life and cannot be entirely eliminated. Where someone makes a slip or lapse in following procedures, or a mistake, disciplinary measures are not usually appropriate. Even when someone violates established procedures (an intentional act not to follow established procedures), you should examine the organisational context. For example, is their violation a one-off, individual act, or is there a culture of workforce non-compliance? The diagram below shows various types of error, and the distinction between the unintentional nature of human error, and the intentional nature of violations.

### Error types

When someone does something wrong, you should look at the underlying cause – why they did it – before deciding on a just consequence.



## Applying the healthy safety culture procedure

### Workflow process

Trigger	Process step	Required action
Incident or event occurs	1. Incident investigation	<ul style="list-style-type: none"> <li>Has the incident investigation been completed?</li> </ul>
	2. Review relevant information & findings	<ul style="list-style-type: none"> <li>Has any human performance issue been identified as a contributing factor?</li> </ul>
	3. Refer to decision chart	<ul style="list-style-type: none"> <li>Apply to only one action (behaviour) at a time.</li> <li>If there are multiple actions by an individual, you should treat each separately.</li> <li>Use for the employee first, then repeat for the manager or supervisor.</li> </ul>
	4. Move from left to right across decision chart	<ul style="list-style-type: none"> <li>Locate the START point at the behaviour description column on the top left-hand side of the page.</li> <li>Determine the most accurate description of the behaviour.</li> <li>At each 'yes' or 'no' check point, record the response. Each subsequent 'no' identifies increasingly intentional reckless behaviour.</li> <li>When you reach the appropriate 'yes', the manager moves down the matrix to seek guidance on the most appropriate consequence.</li> </ul>
	5. Determine disciplinary action	<ul style="list-style-type: none"> <li>If you identify a reckless violation or personal optimising violation, consider disciplinary action for the employee, referencing procedure BA-HR-01.</li> </ul>
	6. Documentation	<ul style="list-style-type: none"> <li>Document any actions and attach decision chart as a record on employee and manager files.</li> </ul>

**Note:** when team members intentionally break a well-known rule to gain a benefit or advantage, or simply disregard known risks or workplace standards, it is reasonable that there should be a personal consequence of violation.

The consequence for unintentional human error must be different to that for violation. Errors may result from a lack of skill, training or knowledge, whereas violations are deliberate acts that knowingly contravene systems, processes and policies. Errors are opportunities for remedial actions to strengthen the system and should not result in punitive actions at an individual level.



image: Civil Aviation Safety Authority

For very small organisations, internal confidential reporting will be impossible. Sharing lapses or mistakes with your colleagues or peers is vital, as is building a culture of openness and trust.

# Appendix B

## Bush Aviation counselling/discipline decision chart

Behaviour type	● Recognition		● Coaching	
	Exceptional behaviour	Expected behaviour	Unintentional error (slip, lapse or mistake)	Routine violation
Team member behaviour <b>START ▶</b>	Did the team member go above & beyond call of duty?	Were all procedures and instructions followed?	Did the team member think they were doing things the right way?	Do other team members normally not follow safety procedures in the same way?
	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶
Team member consequence	<input type="checkbox"/> Recognition or reward <input type="checkbox"/> Record on employee file <input type="checkbox"/> Communicate to wider team	<input type="checkbox"/> No action required	<input type="checkbox"/> Does this happen often? (If yes, routine error & record for trend analysis) <input type="checkbox"/> Record type of error on incident management database <input type="checkbox"/> Coach person on taking more care	<input type="checkbox"/> Coach team members on importance of following correct procedures and not taking shortcuts <input type="checkbox"/> Record on file
Supervisor/manager behaviour <b>START ▶</b>	Did the supervisor/manager also exhibit exceptional behaviour?	Does the supervisor/manager lead by example, by complying with procedures and instructions?	Did the supervisor/manager think the task was being completed in the required manner?	Does the supervisor/manager normally ensure work is completed in the appropriate and correct manner?
	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶	<input type="checkbox"/> Yes ▼ <input type="checkbox"/> No ▶
Supervisor/manager consequence	<input type="checkbox"/> Recognition or reward <input type="checkbox"/> Record on employee file <input type="checkbox"/> Communicate to wider team <input type="checkbox"/> Copy to supervisor	<input type="checkbox"/> No action required	<input type="checkbox"/> Does this happen often? (If yes, routine error & record for trend analysis) <input type="checkbox"/> Record type of error on incident management database <input type="checkbox"/> Coach employee on taking more care	<input type="checkbox"/> Coaching on how to monitor & enforce procedures <input type="checkbox"/> Safety leadership skills training <input type="checkbox"/> Record on file



● **Initiate discipline**

Situational violation	Organisational optimising violation	Personal optimising violation	Reckless violation
<p>Did the team member think the procedure was a barrier to getting the job done?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the team member think there was some benefit for the company by doing the job a different way?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the team member deviate from the procedure to make it easier for themselves?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the team member intentionally not follow the procedure, without thinking or caring about the consequences?</p> <p><input type="checkbox"/> Yes ▼</p>
<p><input type="checkbox"/> Coach the team member on speaking up when procedures cannot be followed, and delaying the job until it can be completed safely</p> <p><input type="checkbox"/> Record on file</p>	<p><input type="checkbox"/> Coach the team member on balancing work and time pressure with company values. Consider disciplinary measures where appropriate</p> <p><input type="checkbox"/> Record on file</p>	<p><input type="checkbox"/> Formal disciplinary action in accordance with relevant procedures</p> <p><input type="checkbox"/> Consider suspension until further action required</p> <p><input type="checkbox"/> Record on employee file</p>	<p><input type="checkbox"/> Formal disciplinary action in accordance with relevant procedures</p> <p><input type="checkbox"/> Consider suspension until further action required</p> <p><input type="checkbox"/> Record on employee file</p>
<p>Did the supervisor/manager know the procedure was a barrier to getting the job done; however, managed the matter appropriately?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the supervisor/manager authorise shortcuts or other non-approved methods, thinking this was a benefit for the company?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the supervisor/manager manage the variance/behaviour on this, or previous, occasions?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No ▼                  ►</p>	<p>Did the supervisor/manager condone the actions of the team member?</p> <p><input type="checkbox"/> Yes ▼</p>
<p><input type="checkbox"/> Coaching on how to monitor &amp; enforce procedures</p> <p><input type="checkbox"/> Safety leadership skills training</p> <p><input type="checkbox"/> Record on file</p>	<p><input type="checkbox"/> Consider health &amp; safety leadership training</p> <p><input type="checkbox"/> Formal disciplinary action in accordance with relevant procedures</p> <p><input type="checkbox"/> Record on file</p>	<p><input type="checkbox"/> Formal disciplinary action in accordance with relevant procedures</p> <p><input type="checkbox"/> Coaching on how to recognise and deal with such behaviour earlier</p> <p><input type="checkbox"/> Record on employee file</p>	<p><input type="checkbox"/> Formal disciplinary action in accordance with the relevant procedures</p> <p><input type="checkbox"/> Consider suspension until further action required</p> <p><input type="checkbox"/> Record on employee file</p>



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