



SMS Phase 3 will provide you with the roadmap that leads you towards the end goal of a true Safety culture. I like to call it the “Safety Management System Administrative Manual”, as this will lay out what your SMS is designed to do. It is simply, say what you are going to do and do what you said you’d do.

A SMS Administrative Manual will require an administrator who is often called “the Safety guy of the organization”. Depending on the size of the organization, the chosen person may already be busy, but will now have an added title and another hat to wear. The success of the company’s SMS will lie on this person’s shoulders and therefore,

he/she must: a) want the job, b) have the training and knowledge to do the job, and c) be given the time and resources required to do it correctly.

There are a few simple rules to follow for success:

1. Do NOT simply copy someone else’s manual. There is lots of guidance material starting with ICAO’s (International Civil Aviation Organization) Annex 19 for a start. You can adapt a manual of a similar sized company, but be very sure it fits your requirements. I recall a company that simply copied another company’s manual only to find out that they had now indicated that they would pick up the bodies in the event of a fatal crash. That manual wasn’t worth the paper it was printed on, yet it had been approved.
2. Remember ICAO has four pillars or frameworks of a SMS found in Annex 19. They are: 1. Safety policy, 2. Safety risk management, 3. Safety assurance, and 4. Safety promotion.
3. Keep it short. It should not be a novel, however, it should dictate how your SMS is to function in the simplest, most understandable terms possible.
4. Unless you’re a small “Mom & Pop” shop, I strongly urge you to consider signing into a SMS computer program that will greatly assist you in analyzing trends and indicate how you are doing. Make sure that the program is designed for a company your size & type of aircraft. The company has to be willing to adapt the program to provide the exact information that you need and is not filled with a lot of information you don’t need. A company that has developed specific programs for companies is Inxelo Technologies Ltd. They are a small company in Croatia that state they will work with you to provide you with exactly what you need. I have spoken with a happy customer that got exactly what they wanted and even in their own language. Just tell Marko or Mario what your needs are.
5. Make sure that you spell out exactly what the procedure will be in the event of a human error. An administrative policy (not discipline, as that is administered in a very small percentage of human errors) should spell out exactly how an error or reported near miss will be administered or handled. Here is where the “guilty party” and his/her workmates have to believe that they will be treated fairly.

The SMS Administrative Manual will start off with the usual **Amendment page**, as there will always be changes for improvement as time goes on. Next should be a **Table of Contents**, followed by a copy of the **Safety Policy**. After all, the purpose of this manual is to support the Safety Policy. Some companies even include their mission statement. Next will be the chapters.

Chapter 1 - Introduction or Purpose. This should be written by the Accountable Executive (AE) and serve as a motivator for everyone to understand and make sure you add reasons that follow the requirements of the manual. Here is where reasonable goals can be set and NOT the ideal, but unrealistic, “zero error” goal. As my father would say, *“If you want perfection you have to die and go to heaven, but that doesn’t mean that you can’t strive for it.”* (Article #38 Nov. 2018) ALARP (As Low As Reasonably Practical) can be part of the goals that you set. In this chapter you should also state that if any person has a Safety concern that does not appear to be addressed through the regular channels in this manual, they have the responsibility to bring it to your personal attention for resolution. Had Boeing had that they likely would have saved untold billions of dollars as well as saved lives.

Chapter 2 - Overview of Responsibilities. In this chapter the responsibilities of the Accountable Executive, management, Safety Manager and employees are explained in detail.

The AE should repeat that as he/she has the final responsibility for the overall Safety of the organization, he/she must be kept informed of any hazards that could jeopardize that Safety.

Management must support and encourage employees by leading by example all requirements of this manual.

The Safety Manager has the responsibility of keeping the AE fully informed on matters of Safety, as well as ensuring that they are complying with the requirements of the regulatory body. This will call for keeping records of all events and the corrective actions that may have arisen from them.

The employees must understand their responsibility to follow the Safety rules, as well as their vital role to report any Safety concerns.

Chapter 3 - Reporting of Hazards. This is a very important step in the SMS process. It should require a simple one page form, preferably on a pink coloured paper to help demonstrate that it has importance. It should be used for all forms of hazards, but if it is a pilot or maintenance hazard, a second form for more detail can be added. It should encourage drawings or pictures to help explain the problem, as well as ask for the sender's suggestions for practical corrective actions. It should finish with a thank you for taking the time to help make our organization Safer.

Accept ALL reported hazards from a loose handrail to a dangerous SOP.

They can be separated into categories after receiving them. When employees see action being taken on small hazards, they are encouraged to report more serious hazards.

Chapter 4 - Risk Analysis. This is the engine that drives the SMS. You will find an overview of this important topic under article #14 (May 2016).

Here is where you “sweat the small stuff so you don’t have to sweat the big stuff.” There are many ways that a potential threat can be analyzed. The easiest is the 5 whys all the way up to BowTie. As this is a large and important subject area, we’ll leave it for a separate article at a later date.

Chapter 5 - Investigating an Incident/Accident. Errors will be made. We humans are genius at finding new ways to make them in spite of regulations designed to prevent them. This chapter will explain the process that will be used when one occurs. As over 80% will point to human error, it is important to implement your just culture (Article #4 March 2015) in this chapter. Boeing’s non copyrighted MEDA (Maintenance Error Decision Aid) is an excellent tool to use to investigate a maintenance event. System Safety Services has developed a SEDA (Safety Error Decision Aid – MEDA with all of the Dirty Dozen included) that you can receive on request. The purpose of the investigation has to be to determine the root causes and develop corrective actions to ensure that it does not happen again, NOT to find the “guilty party” and punish them for the error.

Chapter 6 - Feedback. The importance of feedback cannot be overemphasized. In the early days of Service Difficulty Reports, there was no acknowledgement of it being received or if anything was done with it. It should be no surprise that it didn’t take too long before few were sending them in to what we called “the black hole of bureaucracy.” Everyone wants feedback, so promise them at least an acknowledgement of receipt within a specific period of time, as well as the action taken or about to be taken within a promised time period.

Chapter 7 - Training. OK, I may be biased, but this is an important document and so don’t depend on a computer to explain it or worse yet, “check this out in your spare time”. There will be questions and it takes only one negative leader to trash it, resulting in the exercise being a waste of time. Keep in mind that trainees retain an average of only 20% of the material, so be prepared to do recurrent training as well.

Chapter 8 – ERP. As explained in the last article, an Emergency Response Plan is a must in our high consequence industry. I feel it should be a separate manual that is readily available. One thing not mentioned in the last article is a caretaker program if you fly a lot of tourists. These out of town customer’s next of kin will likely want to fly to the scene of the accident. As they are the ones who will likely be suing



you, having a group of “caretakers” to assist the grieving family members will demonstrate that your company cares. This could be another article if you are interested.

Chapter 9 – Documentation. While it can be a “pain in the butt”, this is where the right computer program can help keep you ahead of what may seem like a tidal wave of paperwork.

While an SMS may seem like a daunting task, it will save you money and go a long way in helping you avoid experiencing “the big stuff.”