

IMPLEMENTATION GUIDE FOR THE AERONOMX SAMPLE SAFETY MANAGEMENT SYSTEM MANUAL

Use this Implementation Guide to help you setup your own Safety Management System (“SMS”) and to modify the downloaded SMS Manual.

The Safety Manager within your organization must read and understand FAA Advisory Circular AC120-92A “Introduction to Safety Management Systems for Air Operators”, and the ICAO Safety Management Manual Document 9859. These documents are free and available with a search on the Internet. If you are members of NBAA, you should purchase and read the documents within the SMS Tool Kit, a product of IBAC.

It is strongly recommended that the flight department manager read the same outside reference documents mentioned above for a complete understanding of SMS and their responsibility within it.

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1. DOCUMENTATION

A. SMS Manual

The SMS Manual template is in MS Word format. It is absolutely necessary for you to customize the sample SMS manual template from AeronomX LLC into becoming your manual that fits your flight department and your situation. There are certain areas in which you will want to replace words or phrases with those of your own.

IMPORTANT NOTE: The Sample SMS Manual template is incomplete on its own and does not suffice as a SMS manual. You **must** modify it to meet the requirements of your flight department in your situation. Though the sample SMS manual template was written to meet the requirements of the FAA and ICAO, if you proceed to have your customized SMS manual audited to meet the requirements of some standard or aviation jurisdiction, the possibility exists that your auditor may interpret some aspect of your manual or this sample manual differently and may require you to modify it further for approval.

Of course you may change any wording anywhere to make it better fit how your operation actually works. Feel free to add or subtract to any section. Make it *your* manual, not *that* manual. This implementation guide will point out some specific areas that you may wish to consider changes.

Cover page. Replace [Company name] with your own company name and/or flight department name. Date the manual. Should you ever revise the manual, you will replace "Original Issue" with your revision number. Whenever you print a paper copy of the manual, or make a digital file of the manual to load into the electronic flight bag ("EFB") for an aircraft, number the copy. This template is listed as the Master Copy.

List of SMS Manual Holders page. The SMS is considered a "controlled" document. That means you need to keep track of who has copies of the manuals and the revision number. List the names of the individuals or offices that have specific numbered copies of the manual. You may or may not want to list addresses and phone numbers; it is not a requirement to list addresses and numbers. Keep a master copy. Give a numbered copy to each flight department employee and one to the person the flight department reports to.

Record of Revisions page. As a controlled document, you must keep track of revisions made to the manual. This template is the original issue, so simply enter the date you issue the manual. You will also need to go to the page footer and enter the date there. The SMS is considered a "living document", which means you are expected to make revisions and keep the manual "fresh" and pertinent to your daily operations. Whenever you do make a revision, keep record of it here in the Master Copy and within every numbered copy. You can make revisions in one of two different ways. One way is that wherever you make any changes on a page, you will give the new replacement page a revision number and date, and then replace the previous page with the new replacement page. The second way to do revisions, which is much easier, is that wherever and whenever you make any changes on any pages, you will reissue an entirely new original issue of the entire SMS manual with a new issue date.

List of Effective Pages page. This page works together with the Record of Revisions page. This template is the original issue, so enter the issue date for each page. If you use the first way of making revisions, it is on this page that you will list the revision number and date of each page. If you use the second way of making revisions but reissuing new original manuals, you will record the new original issue date here.

Page 8. At the top of the page, replace [Company name] with your name. At paragraph 1.2.A., replace [Owner/CEO/or Accountable Executive] with the title of the company executive that has overall responsibility for the flight department. At paragraph 1.2.B., you may wish to replace the title “Flight Department Manger” with the title name within your operation. For example, some operations call this person the “Aviation Manager” or “Director of Operations”.

Paragraph 1.2.D. No Disciplinary Action. It is a very important element of an SMS that employees should not be afraid of being disciplined or losing their job if they submit any report as part of the SMS process. You must keep some language within this section that essentially protects the employee from reprisal. However, this must be balanced with the responsibilities of management and dealing with subpar performance and behavior. This template uses the wording of “...except for a reckless disregard for safety...” to handle situations in which the average employee should have clearly known better when to do or not do a particular act.

Paragraph 1.4. Coordination of Emergency Response Plans. Having an Emergency Response Plan (“ERP”) is considered an essential and integral part of a SMS. This template presumes your flight department has an ERP. If you do not, you must draft a plan soon.

Paragraph 1.5.h. Safety Information Must Read File. Set up a system in which you can post important safety information to be read by everyone in your flight department which includes a means of tracking who has the read the posting or not. This can be a paper system on a bulletin board or in an office drawer, or perhaps a digital system with a company intranet or shared drive. List how and where your file is located here.

Paragraph 2.1.A. Safety Reports. This template calls these reports as “Safety Reports”, but some other flight departments and SMS examples call them “Hazard Reports” or something similar. Call them whatever you wish, but use the term consistently throughout the entire SMS manual.

B. Forms

Paragraph 5.1 Management Commitment Statement. You may use this form for the flight department supervisor to show their commitment to the SMS, or you may substitute this form with a letter from the supervisor. If using the form, place the name of the person’s title in the appropriate place and insert your company name in the proper place. You should point out to your supervisor paragraph 1.2.D. No Disciplinary Action. He or she must understand this provision of the SMS and promise to follow it.

2. Personnel

A. SMS Positions of Responsibility

Paragraph 1.2.A. Accountable Executive. Safety starts at the top. If the top executive of an organization has little regard for safety, the flight department will certainly have little regard for safety too. Having a SMS in this situation is a sham and it is worthless. The top executive and the executive to whom the flight department reports to must understand and agree to follow the functions of a SMS. It is their responsibility to provide the resources to have a SMS and to foster the working conditions for a just culture.

Paragraph 1.2.B. The Flight Department Manager. The flight department manager has specific safety responsibilities as outlined here in the SMS.

Paragraph 1.3.A. Safety Manager. As part of a SMS, you must designate someone within your flight department as a “Safety Manager”. The Safety Manager must take their responsibilities seriously and with diligence. Much of the daily workings of a SMS are handled by the Safety Manager. Within smaller or average flight departments, this is typically a collateral duty assigned to an individual in addition to their normal job responsibilities. In large flight departments, this position might be filled by a full-time employee in which this is their only responsibility. This person can be a pilot, a maintenance technician, or administrative staff. To promote safety oversight, the Safety Manager should not be an operations manager such as the flight department manager, chief pilot, or chief of maintenance. They should have an interest in performing this function as well as some operational experience. It is required that the Safety Manager receive SMS and safety training.

Paragraph 1.3.B. SMS Safety Committee. This template takes the approach that you will form a Safety Committee. Designate these individuals and give them some level of training in SMS theory and structure, safety, and root cause analysis to help prepare them to perform their function. Again, it is common that serving as a Safety Committee member is a collateral duty for that individual in addition to their normal job responsibilities.

3. The SMS Process

A. Overview

The four main elements of every safety management system include:

- a. Safety Policy and Objectives. This step states the policy and goals of your organization and gives meaningful objectives that are measurable. You will be considered safe if you are engaged in best practices that reduce risks and enhance safety. It is not fair to yourself to state a goal that you will have no accidents. It is within your powers to make things happen as opposed to somehow assuring that an accident will not happen. A key policy for every SMS is that hazards to your operations and their associated risks will be avoided, eliminated, or mitigated to as low a level as reasonably practicable. One point to mention, it is referring to a lower risk to a level that is reasonably acceptable to *your* operations, not to an industry standard. You decide what is acceptable or not.
- b. Risk Management. This step includes all of the processes you take to identify hazards and their associated risks. For those hazards and risks that are not acceptable, you must find a way to either avoid that risk, eliminate that risk, or mitigate (reduce it somehow) the risk. The common methods to do these things are to use a Safety Risk Profile, Risk Assessment Tools, a means of reporting incidents or close calls and analyzing them for a cause, and using the information gained from conducting an audit. All of these methods are used in this template.
- c. Safety Assurance. This step addresses how you know and measure that your organization is meeting the goals and objectives you stated in the first step. It is important that your objectives are measurable and not some esoteric statement that you will be safe.
- d. Safety Communication. This step includes having a written SMS manual, training all your flight department personnel how it works and their role in it, and establishing a means of disseminating important safety information to all of your personnel in a timely fashion.

B. Infrequent Tasks

Paragraph 4.3 in the manual lists the timeline for the completion of certain tasks. Infrequently here means once a year or longer, paragraphs 4.3.E, F, and G, or it may be sooner if there has been a change in your organization. Most of these tasks will be within the Safety Policy, Safety Assurance, and Safety

Communication steps. Though they are infrequent, they are nevertheless a very important part of the SMS. These steps include:

- i. The Safety Manager should provide SMS training to every new hire employee
- ii. The flight department manager should annually review the Safety Policy
- iii. Annually provide the Safety Manager with safety training
- iv. The Safety Manager is to complete the Annual Safety Report
- v. The Safety Manager should assure that an internal audit, i.e. conducted by your own staff, for safety and compliance is performed annually
- vi. At a minimum, the Safety Manager should annually update the Safety Risk Profile
- vii. The Safety Manager should provide recurrent SMS training to all employees every 2 years
- viii. The Safety Manager should assure that an external audit, i.e. conducted by a hired consultant, is performed every 3 years

C. Frequent Tasks

Paragraph 4.3 in the manual lists the timeline for the completion of certain tasks. Frequently here means on a daily or regular basis. You will be working the Risk Management step on a daily basis. These steps include:

- i. All employees should maintain a daily vigilance for hazards, risks, and policy defects
- ii. All employees should review the Safety Information Must Read File as necessary
- iii. Any employee should complete a Safety Report as necessary
- iv. Any employee should complete a Risk Assessment as necessary
- v. The Safety Manager should be vigilant of any changes occurring within the department that should be analyzed
- vi. The Safety Committee should meet as necessary, but not less than quarterly

4. Training & Recordkeeping

A. Initial

The Safety Manager will provide SMS training to every employee when you implement this SMS. Every new hire employee will be trained in your SMS. They should understand what a hazard is, and what risks are that are associated with the hazard. They do not need to understand the whole SMS, be rather should understand specifically what is required of them to participate within the SMS.

B. Recurrent

The Safety Manager will provide SMS recurrent training to every employee every 2 years or more frequently. The Safety Manager should review the basics of SMS and the employee's role to participate in your SMS. The Safety Manager should also encourage employees to submit Safety Reports.

C. Recordkeeping

The Safety Manager should be the person who is responsible for maintaining all of the records and documents for your SMS. Here is a list of the records to be kept:

- a. Initial, new hire, and recurrent SMS training for each employee
- b. The SMS Manual master copy, revisions, and distribution list

- c. The Safety Risk Profile
- d. The Safety Information Must Read File
- e. Safety Reports. Though you may wish to consider having a policy to destroy any written Safety Reports submitted after it has been logged into the Safety Committee Evaluation process. Purging this report will help minimize any possibility of discovery by the FAA as an admission of any possible FAR. With this SMS template, at the bottom of Form 5.2 it is noted that the report will be destroyed.
- f. Safety Evaluation, Recommendation, and Tracking Reports
- g. Corrective Action Tracking Form
- h. Safety Committee meeting minutes, notes, and action items
- i. Flight Risk Assessment forms
- j. Any general Risk Assessments

5. Updating

A. SMS Feedback

Information for improving the SMS may come from several sources: a Safety Report, internal safety and compliance audit, or the external safety and compliance audit. The Safety Committee should discuss the merits of each improvement suggestion and determine whether to include the idea into your SMS.

B. Revision Process

Immediate revisions, or temporary revisions, can be stated and posted within the Safety Information Must Read File. Within a reasonable time after a revision or if there is an accumulation of temporary revisions, the SMS Manual should be updated by a revision. Follow the revision process guidelines given in paragraph 1.A. above within the paragraph discussing the Record of Revisions page.

5. FINISHING TOUCHES

Print your finished SMS Manual and insert it into a binder to be carried onboard your aircraft, or uploaded to your Electronic Flight Bag ("EFB"). Have everyone in your department trained to understand and how to participate in the SMS. Document that they received this training and keep it on file for review later. Complete the SMS forms and start submitting Safety Reports.