Safety Management Systems

Guidance for Operators of Isle of Man Registered Aircraft

Introduction

This Industry Notice (IN) provides guidance to operators of Isle of Man registered aircraft on the establishment of a Safety Management System (SMS).

Some small organizations may feel that a SMS is too complex, too time consuming, or too costly to implement. However, implementing a SMS can be simpler than initially expected and many small organizations already have many of the elements of a SMS in place. Fundamentally, a SMS does not have to be complicated to be effective and to generate safety and consequent financial benefits to the operator.

What is a SMS?

A SMS is a systematic approach to managing safety including the necessary organisational structures, accountabilities, policies and procedures. It should be a common sense but organised means of managing safety. A SMS attempts to put the proven safety management processes together in a sound framework so that the processes work as a system to enhance the safety, efficiency and effectiveness of the operator.

SMS is just as relevant for a small operation as for the operator of multiple aircraft; however, what is appropriate for a single aircraft owner/operator is unlikely to be appropriate for the operator of several or more aircraft. Consequently, the Isle of Man Aircraft Registry (IOMAR) expects aircraft operators to tailor their SMS to their particular operation.

The IOMAR endorses the ICAO standard[1] which states that "the SMS of an international general aviation operator, conducting operations of large or turbojet aeroplanes in accordance with Annex 6 Part II Section 3 shall be commensurate with the size and complexity of the operation".

Benefits of a SMS

A SMS allows an aircraft operator to take a proactive approach to safety by identifying causal factors that contribute to errors being made. The SMS helps you to have a greater understanding of safety by eliminating the hazards or reducing the related risks and therefore the likelihood of accidents and incidents occurring. A SMS also helps to prevent or minimise minor occurrences that can lead to a minor injury, aircraft down time, or even legal costs. The existence of a SMS can also be beneficial in giving confidence to customers, financial institutions and insurers that safety risk is being understood and managed. Additional SMS benefits can include in improved intercompany communication, building a safety culture and providing regulator confidence.

With an SMS it should be possible to systematically and proactively anticipate hazards and reduce 'surprises' by making effective risk management decisions.

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[1] ICAO Annex 19, 4.2.1

Requirement for a SMS

In accordance with ICAO Annex 6 Part 2 requirements, Article 99B of the Air Navigation (Isle of Man) Order 2015[2] specifies that operators of 'large and turbojet aircraft' must prepare and ensure that a company operations manual is in force in respect of the aircraft. The company operations manual must include (amongst other items) details of the aircraft operator's SMS.

For all other operators, the IOMAR strongly recommend that the SMS principles are applied to their day to day operation.

Essential Elements of a SMS

ICAO recommends[3] that the SMS for international general aviation aircraft operators should as a minimum include:

a) a process to identify actual and potential safety hazards and assess the associated risks;

b) a process to develop and implement remedial action necessary to maintain an acceptable level of safety; and

c) provision for continuous monitoring and regular assessment of the appropriateness and effectiveness of safety management activities.

The IOMAR advocates the use of the ICAO SMS Framework[4] shown below as a means of structuring a SMS and meeting the above ICAO recommendation. The framework comprises four components and twelve elements as the minimum requirements for SMS implementation all of which are considered to be relevant regardless of the size and complexity of the operation:

a) Safety policy and objectives:

    i. management commitment and responsibility;

    ii. safety accountabilities;

    iii. appointment of key safety personnel;

    iv. coordination of emergency response planning;

    v. SMS documentation.

b) Safety risk management:

    i. hazard identification;

    ii. safety risk assessment and mitigation.

c) Safety assurance:

    i. safety performance monitoring and measurement;

    ii. the management of change;

    iii. continuous improvement of the SMS.

d) Safety promotion:

    i. training and education;

    ii. safety communication.

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[2] SI 2015 No 870 as amended by SI 2016 No 155
[3] ICAO Annex 19, 4.2.2
[4] ICAO Annex 19, Appendix 2

The ICAO SMS framework is also used within RP56a[5] - Company Operations Manual (COM) Template as the IOMAR recommended means of structuring the COM content on SMS.

SMS Guidance for Small Organisations

The IOMAR has identified and listed below sources of reliable information and guidance that are particularly relevant to small organisations in developing a SMS to meet the ICAO SMS Framework. Each are valid and produced by highly credible organisations. However, the suitability of any content will depend on your organisations particular circumstances and arrangements and should be adapted as necessary to meet your own requirements.

SMS for Small Organisations is published by the Safety Management International Collaboration Group (SMICG). Founded by the US FAA, EASA and Transport Canada, the SMICG is a joint cooperation between many regulatory authorities for the purpose of promoting a common understanding of SMS and facilitating their implementation across the international aviation community. The document provides guidance for implementing SMS in smaller organisations and includes tools and templates.

CAP1059 - Safety Management System: Guidance for small, non-complex organisations is published by the UK CAA and provides generic guidance on SMS for small, non-complex organisations including templates and example documents and forms.

SMS for small, non-complex organisations is published by CASA and provides a short practical guide on how to implement a SMS.

Implementing Safety Management Systems - guidelines for small aviation organisations - BOOKLET three is published by the New Zealand CAA and contains information designed to help aviation organisations implement an effective SMS without being difficult or resource-intensive. The booklet has been written specifically for organisations that have a small number of staff and/or non-complex organisational activities.

Note: the provision of these sources of guidance does not negate the requirement to comply with other IOMAR legislative requirements e.g. where guidance material refers to occurrence reporting processes, it remains a requirement to comply with the IOMAR requirements for Mandatory Occurrence Reporting.

International Standard for Business Aircraft Operations

The International Standard for Business Aircraft Operations (IS-BAO™) is designed to promote the use of high quality operating practices for international business aircraft operations by:

 a) establishing a framework for effective safety and operational processes;

 b) providing tools to perform gap analyses to facilitate the implementation of best practices;

 c) delivering a Safety Management System appropriate to the aircraft operator's profile.

The IOMAR requirements for SMS are consistent with those required to achieve compliance with IS-BAO. Furthermore, the IOMAR recognises the aims and aspirations of IS-BAO to raise the safety bar, and the clear benefits this brings to the operator in doing so.

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[5] Available on request