

Safety Management Systems (SMS) guidance for organisations

CAP 795



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Introduction

The purpose of this document is to provide guidance on the implementation of Safety Management Systems (SMS). It has been developed to give sufficient understanding of SMS concepts and the development of management policies and processes to implement and maintain an effective SMS. It applies to Air Operator's Certificate (AOC) holders, continuing airworthiness management organisations, maintenance organisations, air navigation service providers, aerodromes and approved training organisations.

This document meets ICAO Annex 19 requirements and is a UK CAA alternative means of compliance for the EASA management system requirements in respect of safety management. We will assess for compliance and effectiveness of an SMS using the CAA SMS evaluation tools that can be found on the CAA website.

A safety management system is a systematic and proactive approach for managing safety risks. As with all management systems, SMS includes goal setting, planning, and measuring performance. An effective safety management system is woven into the fabric of an organisation. It becomes part of the culture; the way people do their jobs.

Safety management goes beyond compliance with prescriptive regulations, to a systematic approach where potential safety risks are identified and managed to an acceptable level. SMS adopts a business-like approach to safety, similar to the way that finances are managed, with safety plans, safety performance indicators and targets and continuous monitoring of the safety performance of the organisation. It enables effective risk-based decision making processes across the business.

It is important to recognise that SMS is a top down driven system, which means that the accountable manager of the organisation is responsible for the implementation and continuing compliance of the SMS. Without the wholehearted support and ownership of the accountable manager the SMS will not be effective. However, safety is a shared responsibility across the whole organisation and needs the involvement of all staff.

There is not a 'one size fits all' model for SMS that will cater for all types of organisations. Organisations should tailor their SMS to suit the size, nature and complexity of the operation, and the hazards and associated risks inherent with its activities. Guidance for smaller non-complex organisations is contained in CAP 1059 that can also be found on the CAA SMS Home page at www.caa.co.uk/sms as well as other useful information.

Where an organisation is part of a group that has several approvals a single Group SMS may be developed provided that there is clear accountability between the group and the subsidiary companies.

Chapter 1

Safety Management System (SMS)

SMS is a proactive and integrated approach to managing safety including the necessary organisational structures, accountabilities, policies and procedures. It is more than a manual and a set of procedures and requires safety management to be integrated into the day to day activities of the organisation. It requires the development of an organisational culture that reflects the safety policy and objectives.

At the core of the SMS is a formal risk management process that identifies hazards and assesses and mitigates risk. It is important to recognise that even with mitigations in place, some residual risk will remain and an effective SMS will enable organisations to manage this.

Risks generated by contracted activities and other third parties should also be considered. Therefore, when the organisation has a formal agreement with another organisation this should include provisions for the management of safety. This should also include reporting procedures for safety related matters.

Safety Management System implementation

For many organisations there will be some elements of an SMS already in place so carrying out a gap analysis is the first step. The CAA Phase 1 SMS evaluation framework is available on the CAA website and forms the basis of the CAA's initial assessment of an organisation's SMS. There are two versions one for complex organisations and a simpler version for non-complex organisations. For help in determining whether an organisation is complex or non complex please refer to the appropriate EASA requirements.

Where gaps have been identified these should be included in an implementation plan. The plan should detail the gaps and the actions to be taken (what, when and by whom) to implement an SMS. The plan should be developed to allow prioritising of the different elements over a period of time. Building an SMS overnight will be far too challenging and a step by step approach will deliver a more effective SMS in the end.

Chapter 2

The key components of a safety management system

The SMS should comprise of the following four key components:

- a) Safety policy and objectives;
- b) Safety risk management;
- c) Safety assurance;
- d) Safety promotion.

Whilst the four components above appear to be separate, it is important to recognise that they are all interrelated. They can only function effectively if all four are built on a foundation of a positive safety culture. This should be driven from the top of the organisation by the accountable manager and the senior management team

Each of these four components will now be considered in the following sections.

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Chapter 3

Safety policy and objectives

The safety policy and objectives can be divided into the following five areas:

- a) Management commitment and responsibility;
- b) Safety accountabilities;
- c) Appointment of key safety personnel;
- d) Coordination of emergency response planning;
- e) SMS documentation.

The safety policy outlines the aims and objectives that the organisation will use to achieve the desired safety outcomes. It should declare the principles and philosophies that lay the foundation for the organisation's safety culture and be communicated to all staff throughout the organisation. The creation of a positive safety culture begins with clear, unequivocal direction and ownership from the accountable manager.

In preparing a safety policy, senior management should consult with the key safety personnel, and where appropriate, staff representative bodies (employee forums, trade unions, for example). Consultation will ensure that the safety policy and stated objectives are relevant to all staff. It will generate a sense of shared responsibility for the safety culture in the organisation. A positive safety culture is one where all staff are responsible for, and consider the impact of, safety on everything they do.

Management commitment and responsibility

The accountable manager should have full responsibility and accountability for the SMS and should have:

- a) Corporate authority for ensuring all activities can be financed and carried out to the required standard;
- b) Full authority for ensuring adequate staffing levels;
- c) Direct responsibility for the conduct of the organisation's affairs;
- d) Final authority over operational matters;
- e) Final accountability for all safety issues.

Senior Management should:

- a) Develop the safety policy, which is endorsed and actively supported by the accountable manager;
- b) Continuously promote the safety policy to all staff and demonstrate their commitment to it;
- c) Specify and allocate necessary human and financial resources;
- d) Establish safety objectives and performance standards for the organisation. Safety Performance Indicators (SPIs) should be established that monitor and measure the safety performance of the organisation and the effectiveness of the SMS.

The safety policy should include a commitment to:

- a) Strive to achieve the highest safety standards;
- b) Comply with all applicable legal requirements, meet all applicable standards and consider best practice;
- c) Provide appropriate resources;
- d) Determining safety as a primary responsibility of all staff especially managers;
- e) Ensure that the policy is implemented and understood at all levels, both internally and externally.

The safety policy should actively encourage effective safety reporting by defining a just culture. This should define the line between acceptable and unacceptable performance and provide fair and just protection to all personnel.

Safety accountabilities

The organisation should clearly define the lines of safety accountability throughout the organisation. This should include the direct accountability for safety on the part of the accountable manager and senior management. There is also a need to define the safety responsibilities and expected behaviours of key personnel (nominated post-holders, safety manager, safety officers, safety committee members, for example). Safety is everyone's responsibility and all staff should be aware of their safety roles and responsibilities.

It is essential that safety management is seen as an integral strategic part of the organisation's business by assigning the highest priority to safety. With this in mind, there has to be a demonstrable board level commitment to an effective SMS.