SMS for **Part 135s**

How do you establish and maintain a robust reporting system? How do you engage staff? *Vector* asked three organisations – two already SMS-certificated, and one well along the way.

For Richard Rayward of Tekapo-based Air Safaris, leading from the top in SMS is crucial.

Richard has taken his own advice seriously, formally reporting his own occurrence of momentarily being caught out by a snow-created illusion, despite being in very familiar territory.

"Pukaki aerodrome, in the Mackenzie Basin, has a full length taxiway, parallel to the main runway. The snow was in patchy lines and I briefly lined up with the taxiway instead of the runway when turning finals.

"The value in that report was not so much what I said," says Richard, "than the fact I said it at all. It showed I was willing to report which would encourage others to as well.

"If you want commitment from the whole staff, you must lead from the top."

In a small operation it's comparatively easy to report and deal with issues.

"At some point of almost every day, we're in the same room, so it's not hard to bring up issues, discuss and resolve them, and monitor the outcomes."

As to documentation, the company has a simple paper-based reporting form that includes space for follow-up preventive action. The safety officer normally takes responsibility for documenting that.

While the paper-based system at Air Safaris is sufficient for the 12-employee company, at Blenheim-based Sounds Air an online system was introduced about 18 months ago.

The safety officer at Sounds Air, Craig Anderson, says the online system has increased reports by "quite literally, about a thousand percent.

"We have a predominantly younger crew and they think in an online way. With the paper-based system, we might have had 20 reported occurrences a year, whereas now we're getting 25 a month. I think that tells me staff wanted to do the right thing – management just had to give them a simple way of doing it."

Massey Lynch, fixed wing operations manager with Philips Search and Rescue Trust, says his organisation introduced a computer program, meeting many of its training and operational needs, including occurrence reporting.

"All staff can file reports and see the hazard register easily and quickly, including on their cellphone. It does make everything more accessible, and especially suits our younger generation of employees.

"When a report or suggestion has been made, all the assigned personnel can view the investigation progress and add further comments, actions and suggestions – contributing to the direction of the investigation until it's been closed. That makes for an open and collaborative process which often results in much more effective outcomes than were perhaps previously able to be realised.

"The computer programme is a significant cost, but we see it as an investment."

Craig Anderson says Sounds Air staff know they'll always get an email or call from the part-time occurrence investigator for details of whatever incident they reported.

"People lose interest if they don't see things changing, so the investigator's sole job is dealing with occurrences, and follow-up with outside organisations, if necessary, like Airways, BP or the CAA."

Craig says the company making their SMS as practical as possible has also smoothed the way for staff engagement.

"We didn't make changes unless they were going to make things better, for instance, the current obsession with high-vis vests anywhere outside. These days, if you don't wear a high-vis vest you are more likely to stand out! So we made wearing one a requirement only in areas where it genuinely added to safety.

"So, practical, simple, and couched in plain language. Otherwise it won't work, especially in a small operation, because people don't have the time or resources for anything else."

Craig says the biggest change for Sounds Air under SMS was recording safety actions.

"We were actually doing quite a bit informally, but the resolution to an issue might have just been a conversation, and there was, I guess, the danger that everyone would eventually forget.

"So that required a change in thinking but you can be quite inventive. For instance, we had an email exchange about an issue, including how it was to be resolved. I took a screenshot of that exchange, and that was our documentation."

Richard Rayward says much of what's required by SMS should already be in a good QA system. But complacency is always a trap.

"After 50 years in business, it doesn't seem like there are many unknown hazards, as you can imagine! But things do change and there are variations in opinions about what constitutes a major hazard.

"We have a practice, on quieter days, of holding brainstorming sessions about hazards, everyone understanding we expect them to be alert to anything potentially dangerous. Sometimes we can get a bit too much reporting! But staff know we will always consider what they've said, and their suggestion won't be ridiculed or treated unfairly.

"While we do get some reports of things that don't really pose a safety hazard, you accept those as part of an open and robust reporting system. You don't dismiss them because you think they're too small. Besides, everyone has a slightly different idea of what constitutes an issue.

"At the other end of the spectrum, you have to be a wee bit careful that people don't start to question the value of a safety intervention, because nothing ever happens.

"For instance, in our very early days, we used to have multiple occurrences of people taking off with seat belts hanging outside the doors, or fuel caps left off or dipsticks still left on the aircraft. So we introduced a very formal walkaround to check those things. Since we introduced that, we've had no recurrence, so we need to keep newer staff members aware of why we do it."

Craig Anderson says one of the benefits of establishing an SMS is that management gets to know its business better.

"Often we discover that it's not so much that someone individually stuffed up, as that we have structured things in such a way that allows mistakes to happen.

"There've been quite a few cases where we've sat back, and said, 'hey, we need to do things a bit differently,' or 'gee, we never thought of that in the past, but perhaps we'd better'.

"That's why it's so important to involve your staff from the start. While someone has to drive SMS, it's the staff who have the ideas, which are often great – simple and sensible. We might have been about to put some complex decision in place, and they will come up with something brilliantly practical.

"Air Wanganui's journey to SMS implementation began in September 2015, when Part 100 was in its draft form. We thought we'd get ahead of the game and, somewhat naively, rushed together an implementation plan for approval. Reality hit home when the business had its first plan returned in February 2016…

"So, using the CAA SMS resource kit, we started again. Since then our focus has been on weaving SMS through our management systems, health and safety procedures, quality management processes, and most importantly, embedding it in our daily operations.

"We now have a very good understanding across the whole business, of the shift required regarding our approach to safety, and, critically, we have buy-in across the whole business organisation from the board down."

Dean Martin, CEO, Air Wanganui.

Photo courtesy of Air Wanganui.