The Senior Manager’s Role in SMS

Introduction
This document has been developed by the SMS International Collaboration Group which the CAA is a key participant in.

The introduction of SMS is one of the most significant regulatory changes you are faced with that will further advance aviation safety within the UK and globally. As the Accountable Manager, you and your senior management team’s role is pivotal to making your SMS work and it is important to understand why and how you can make a difference to safety.

Don’t think of it as just another layer of regulation, but as a business tool to help you manage your safety risks and make the right business decisions.

Managing your safety risks is good for business.

No matter how interested individual employees might be, or what assistance a manufacturer offers, or how insistent a certificating authority might be – none of these factors will have a significant effect on safety without support from top management.

John O’Brien

What is SMS?
There is a common misconception in aviation about where safety fits in the organization. Many have traditionally believed that safety happens and belongs on the flightdeck or on the ramp or in the hangar. Few could argue that the implications of poor safety decisions or behaviours are evident in line operations and production and maintenance, but what of the safety ownership? Where should safety belong?

An approach to aviation is emerging which puts safety ownership squarely in the realm of management. This is where risks are weighed against financial viability, this is where priorities are set and resources allocated. And importantly management is where the safety culture of the organization is established.

Within the range of objectives that aviation organisations pursue, regardless of the nature of the services they deliver, safety must be a priority. It makes sense from a practical perspective, is a must from a moral and legal perspective, and there’s a vitally important role for senior managers in its management. Managing safety makes good business sense and many of the good practices for safety are also good practices for effective operations and business risk management. Safety Management Systems (SMS) provide the aviation manager and their staff with a vehicle for the management of safety. Specifically, SMS provides a set of beliefs, systematic practices and integrated procedures for the mitigating and monitoring safety risks.
Aviation is a latecomer to safety management systems. Aviation safety has been maintained more by fear of the consequences and learning from 100 years of fatal accidents. The petrochemicals and nuclear power industries have had SMS in place for more than 20 years.

**Safety management systems defined**

A safety management system is a businesslike approach to safety. It is a systematic, precise and proactive process for managing safety risks. As with all management systems, a safety management system provides for goal setting, planning, and measuring performance. A safety management system is woven into the fabric of an organization. It becomes part of the culture; the way people do their jobs.

**Structure of a safety management system**

The universally accepted framework includes four main components and twelve elements, representing the minimum requirements for SMS. These “capabilities” apply regardless of the aviation context. The four main components are:

- Safety policy and objectives
- Safety risk management
- Safety assurance
- Safety promotion

**What a safety management system is – practically**

Managing safety is really about managing safety risk, which means trying to prevent bad things from happening, or if something does go wrong, or slips through the cracks, trying to minimize the consequences of the event.

Safety management is about accepting that things will go wrong and about reactively, proactively and predictively controlling risks to a level that is acceptable.

It can help you predict potential risks, take appropriate action and measure how well risk controls are working. It can give you the business information you want to manage risks in other areas such as finance or productivity.

**What a safety management system isn’t – practically**

A safety management system is not the same as operations in the past. That is, your main game will still be operating an aviation business; but SMS does provide an underpinning structure which enables you to manage risks in your operation and, when implemented effectively, improve the effectiveness of your operation.

Safety management systems are not Quality Management Systems (QMS), although they do share many of the same features and capabilities; such as performance targets, reporting, governance and performance monitoring. The objective of a QMS is the control of processes to achieve predictable and
desirable results that meet with customer’s and organisation’s requirements. Whereas the objective of an SMS is to control operational risks and to provide an improving safety record. If you have a functioning QMS then your staff will already be familiar with reporting and feedback and, most importantly, they’ll already be on their way to an effective reporting and safety culture – which is vital to the implementation and sustainability of your SMS.

Finally, the SMS is not a manual, a database, or a reporting process; these are all tools. The SMS lives in the DNA of your organization. It penetrates into the operation’s processes and activities and it shapes critical management thinking. The SMS is a vital management capability where staff are the eyes and ears, the safety group is the heart and the management is the decision making “brain” of the system.

Why you should be involved: a practical perspective

Primarily, your SMS gives you control over the safety risks of your business. In aviation, management of safety risk is a core activity. Like financial management, senior managers need to control how safety risks are managed. Many countries have regulations have regulations which put senior management in charge of the safety of their business, and hold them directly accountable for poor safety performance. The best organisations have SMS in place without any requirement from their regulator – because it makes sense and it works.

Profits are made by taking risks. Senior managers are responsible to the shareholders and other stakeholders to ensure the business is profitable. Senior managers are always risk managers, but some managers don’t realize that risk management is what they do. Risks should only be taken if the assessed level of the risk is acceptable and defensible. SMS provides an objective framework and an organizational risk structure which supports you with your of risk. Without a framework, how can you assure yourself, and your stakeholders, that the risks you take are acceptable? How do you know – objectively – when “go” or “not go”? And how would you defend your operational risk decisions without an objective framework?

An effective safety management system provides many other potential benefits, including:

- The ability to control the potential risky operations faced by the business
- A clear and documented approach to achieving safe operations that can be explained to others
- Active involvement of staff in safety
- Demonstrate control for the regulator, your customers and other stakeholders that your risks are under control
- Building a positive safety culture
- Reduction or removal of operational inefficiencies
- Decreased insurance costs and improved reputation
- A common language to establish safety objectives and targets and implement and monitor safety risk controls
- Potential defence from legal action.

Effectively, SMS represents a continued evolution in safety. The first 50 years of aviation safety was based on individual risk assessment. The second 50 years was dominated by safety compliance. SMS
leverages the first two and exploits information age processes and management techniques to better inform managers and empower you to manage risk.

**Why you must be involved: a legal perspective**

The International Civil Aviation Organisation (ICAO) has recommended that member states require SMS for some aviation sectors for many years. Regardless of which sector you operate in, ICAO – and most likely your Civil Aviation Authority (CAA) – requires you, or will require you before long, to implement an SMS throughout your organization.

In most countries, senior management are being held accountable by regulators for safety; as well as financial outcomes. This requires senior managers to clearly identify what they are accountable for. The responsibility can be delegated but not the accountability.

Traditionally, regulators have held staff and line managers accountable for operational non-compliances. This was, in many cases, unfair and unproductive because the individual held to account did not have funds and/or the delegated authority to implement or enforce the necessary actions for compliance. There is a growing appreciation that the senior manager – and in particular the Accountable manager – is often the only person who can make the difference. The accountability for safety of your operation rests squarely with you.

It is also important to keep in mind that you are accountable for every aspect of your operation, even the safety assurance of third party goods and services. You must assure yourself of the safety of these provisions. SMS can help in this regard by requiring that safety is a consideration in all third party contracts.

**How you get involved: a leadership perspective**

**Lead from the front**

The safety management system philosophy requires that responsibility and accountability for safety be retained within the management of the organization. Managers are ultimately responsible for safety, as they are for other aspects of the enterprise. Regardless of the size, complexity or sector of your business, you have a significant role in developing and sustaining your SMS, and, in concert with this, a positive safety culture. Without the unconditional and ongoing commitment of senior management, any attempt at an effective safety program will be unsuccessful. You must not only be committed to your SMS, you must be seen to be committed.

**Walking and talking at the same time**

Whether you know it or not, whether you intend it or not, you are a leader. You are a role model for all the people in your organization. They watch what you do and imitate your words and your actions. From the top to the bottom, from the center to the outposts of the organization, your traits, your attitudes and your actions, will be copied. If you believe safety is important to the security and prosperity of your
organization, and your actions reflect your beliefs, your staff will invest their own time and efforts; and given time, will make your beliefs and actions their own.

You can leverage and broadcast your beliefs by publicly announcing your views through staff newsletters, safety articles and safety bulletins. You can also declare your commitment to your SMS by publicly rewarding those managers and staff who demonstrate exemplary safety behavior and/or proactively identify hazards or suggest workable safety solutions.

Create a positive safety culture

Ultimately, the success of an SMS hinges on the development of a positive safety culture which promotes open reporting through non-punitive disciplinary policies and continual improvement through proactive safety assessments and quality assurance. This will be achieved by the implementation and continual support of an SMS based on cohesive policies and procedures. Creating a positive safety culture will also help identity what is really going on in your organization, and help you understand your risks.

A positive safety culture is the embodiment of effective programs, decision making and accountability at all levels. Safety culture, first and foremost is about how managerial decisions are made, about the incentives and disincentives within an organization for promoting safety. There is often a great gap between what senior management believe to be the safety culture of an organization and what is actually going on.

Inspiring staff with a safety vision

This is key to creating a positive safety culture. Establishing and promoting a safety vision which staff can aspire to is one of the most powerful actions senior manager can take. Seeking input from staff adds even more weight. A message from the top team that “safety matters” affects decisions and morale of staff. Safety objectives and safety targets support the safety vision. Each of these endeavours sends a clear message to staff that we’re on board with SMS and on the road to achieving our safety vision.

Leading safety meetings

One of the best ways to be involved is by leading the highest level safety meetings. As an Accountable Manager you are responsible for the safety of your organization, so it makes sense that you are front and center during regular executive safety meetings. By making yourself available for these meetings you can:

- Review your organisation’s safety objectives and monitor achievement of your safety targets
- Stay up to date on the safety health of your business
- Make timely safety decisions
- Allocate the appropriate resources
- Hold managers accountable for safety responsibilities, performance and implementation timelines
- Be seen by managers and staff as a person who is interested in, and in charge of, safety.
What you can delegate and what you can’t

Although named as the Accountable Manager(s), senior managers often are not involved in, or have little knowledge of, the systems or the problems faced in the workplace. Senior managers often delegate the duties and responsibilities so as to maintain control of the competing ‘top priorities’. Senior managers can delegate responsibility for day-to-day operation of the SMS – BUT – senior managers can not delegate accountability for the system and important risk decisions.

You can not delegate:

- Assuring safety policies are appropriate and communicated – by you
- Assuring necessary allocation of resources – financial, personnel, training, acquisition, etc.
- Setting of the risk limits and resourcing of the necessary controls

Providing the appropriate resources

SMS can, when mature, significantly improve the efficiency of your operation, potentially saving you time and money – although this is an indirect benefit rather than a stated aim. The safety management system does need resources to function effectively. You can be involved – and most effective – in your SMS by providing appropriate resources, such as: appropriate number of competent safety people, training, funding risk mitigations, facilities, communications and publicity.

Summary

A safety management system (SMS) is a businesslike approach to safety. It is a systematic, explicit and comprehensive process for managing safety risks. As with all management systems, a safety management system provides for goal setting, planning, and measuring performance. A safety management system is woven into the fabric of an organization. It becomes part of the culture, the way people do their jobs.

You should get involved because SMS gives you control over the safety risks of business. In aviation, management of safety risk is a core activity. SMS provides you with a framework for management of risk. Without a framework, how can you assure yourself that risks are acceptable? How do you know – objectively – when to ‘go’ or ‘not go’?

You must get involved because, regardless of the aviation sector(s) you are in, CAAs require, or will require that you implement an effective SMS. Traditionally, staff or line managers have been held accountable for non-compliances – often unfairly and/or unproductively because they don’t have funds and/or authority to make significant change happen. Senior managers are usually the only people who can make the difference. The SMS will help you stay on track and provide a powerful vehicle for positive change.

You get involved by: leading from the front with your SMS implementation, talking positively about SMS and ensuring your actions reflect your words, creating a positive safety culture, inspiring staff with
safety vision, knowing what you can delegate and what you can’t, and providing the appropriate resources.

This paper was prepared by the Documentation Workgroup of the Safety Management International Collaboration Group (SM ICG). The purpose of the SM ICG is to promote a common understanding of Safety Management System (SMS)/State Safety Program (SSP) principles and requirements, facilitating their application across the international aviation community.

The current membership of the SM ICG includes the Core Group members comprising the three initiating members: US Federal Aviation Administration (FAA), Aviation Safety (AVS); European Aviation Safety Agency (EASA); Transport Canada Civil Aviation (TCCA); as well as the following additional Civil Aviation Authorities (CAAs): Civil Aviation Authority of New Zealand; Civil Aviation Safety Authority (CASA) of Australia; National Civil Aviation Agency of Brazil (ANAC); Japanese Civil Aviation Bureau (JCAB); EASA is also represented by members from the Federal Office of Civil Aviation (FOCA) in Switzerland, the Direction General de l’Aviation Civile (DGCA) in France and the United Kingdom Civil Aviation Authority (UKCAA).

Members of the SM ICG:

- Collaborate on common SMS/SSP topics of interest
- Share lessons learned
- Encourage the progression of a harmonized SMS
- Share products with the aviation community
- Collaborate with international organizations such as ICAO and civil aviation authorities that have implemented or are implementing SMS