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# 1.0 Safety Management System

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# 1.0 Safety Management System

## 1 Scope and Applicability

### 1.1 Purpose

The primary role of the Aviation Safety Department is to promote programs that support operational excellence, prevent accidents and incidents, and manage corporate risk. The Airline Safety Management System (SMS) is proactive, predictive, and data-driven in nature. SMS components include the collection, analysis, and dissemination of safety information. The purpose of the SMS is to raise safety awareness throughout the organization.

### 1.2 Scope

1.2.1 The scope of the Safety Management System is established by the Chief Executive Officer (CEO) for the Airline. It is described, documented, and communicated to employees through the Safety, Policies and Procedures Manual (SPPM 1 [9]).

1.2.2 The Aviation Safety Department serves as the primary liaison for implementation of the SMS at the Airline. This document applies to all Aviation Safety personnel and includes all activities, processes, and procedures within the Aviation Safety Department.

### 1.3 Authority and Responsibility

The Director – Aviation Safety has the authority to establish and modify this document. The General Manager – Flight Safety has responsibility for the quality of the content.

## 2 References

- [1] Federal Aviation Administration (2006). Introduction to safety management systems for air operators. *Advisory Circular 120-92*.
- [2] Airline. (2007). *2.0 Aviation Safety Quality Management System*.
- [3] Airline. (2007). *2.1 Aviation Safety Terms and Definitions*.
- [4] Airline. (2007). *2.2 Aviation Safety Document Control Process*.
- [5] Airline. (2007). *2.3 Aviation Safety Control of Records*.
- [6] Airline. (2007). *3.0 Aviation Safety Reports*.
- [7] Airline. (2007). *4.0 Aviation Safety Investigations*.
- [8] Airline. (2007). *5.0 Aviation Safety Data*
- [9] Airline. (2007). *1 Safety Policies and Procedures Manual*.

## 3 Terms and Definitions

All terms and definitions for Aviation Safety are detailed and documented in *ASOP 2.1 [3]*.

## 4 Policy

### 4.1 General Requirements

- 4.1.1 Safety Management System processes are documented in this section and monitored according to the Aviation Safety Department roles and responsibilities, as detailed in the Aviation Safety Manuals (ASMs). These processes are also measured *ASM 3.0 [6]* and analyzed *ASM 5.0 [8]*.
- 4.1.2 All SMS outputs are recorded, controlled, and documented according to *ASOP 2.3 [5]*. Departmental outputs are recorded according to the Aviation Safety Department scope, documented in the respective ASMs, and retained for specific traceability and identification.
- 4.1.3 The organization promotes a positive safety culture as detailed in sections 4.2 and 4.3.

### 4.2 Safety Policy

- 4.2.1 The scope of the Safety Management System is established by the CEO for the *Airline*. It is described, documented, and communicated to employees through the Safety Policies and Procedures Manual.
- 4.2.2 Mission Statement: Aviation Safety supports the safety-oriented culture of the *Airline* by identifying threats to the operation, assisting operational divisions in the proactive management of human error, and conducting safety investigations.

### 4.3 Quality Policy

The *Airline* is committed to providing our customers with the highest level of product and service quality results derived from a quality system whose foundation lies in a culture of safety, customer satisfaction, and continuous improvement.

- 4.3.1 Providing a safe and secure operation is the first and most fundamental obligation to our customers and employees, as well as to the communities we serve.
- 4.3.2 Consistently meeting customer expectations is both our collective duty and the foundation of our success.
- 4.3.3 The *Airline* maintains the highest standard of business conduct and operates in full compliance with all applicable laws and regulations.

- 4.3.4 Every Airline leader and employee has an inherent responsibility for an ongoing commitment to quality and to the promotion of a quality culture.
- 4.3.5 Continuous improvement of the quality management system, including an annual review of quality objectives, is a required focus of our business endeavors.
- 4.4 Safety Planning
  - 4.4.1 As directed by the CEO through the Vice President – Corporate Safety, Security, and Compliance (VP – CSSC), the Aviation Safety Department coordinates the implementation of the SMS at the Airline. Each participating division has appointed an SMS project leader who represents his or her respective division in facilitating the implementation of the SMS. Aviation Safety has appointed liaisons to coordinate these efforts within each division.
  - 4.4.2 Each participating division will establish an organizational structure that supports the guidance of AC 120-92 [1]. The structure and procedures for the divisional SMS will be documented in the SMS manual for that division. Any deviations or changes to the divisional SMS will be coordinated with the Aviation Safety Department through the divisional SMS project lead.
- 4.5 Organizational Structure and Responsibilities
  - 4.5.1 Senior Leadership Responsibility: The Chief Executive Officer (CEO) is ultimately responsible for the Safety Management System and provides the necessary resources to implement and maintain the program. The CEO has designated the Director of Safety (VP – CSSC) to be the member of management who:
    - A. Ensures that processes needed for the SMS are established, implemented, and maintained.
    - B. Reports to top management on the performance of the SMS and specific areas in need of improvement.
    - C. Promotes awareness of the SMS throughout the Airline.
  - 4.5.2 The VP – CSSC has designated the Director – Aviation Safety as the person responsible for managing the development and implementation of the Safety Management System at the Airline.
  - 4.5.3 Aviation Safety-related Positions: All aviation safety-related positions within the Aviation Safety Department are defined, documented, and communicated to employees through the Aviation Safety Quality Manual (ASM 2.0 [2]).
- 4.6 Compliance with Legal and Other Requirements

The Director – Aviation Safety ensures that all components of the SMS comply with all safety-related legal and regulatory requirements. These include, but are not limited to:

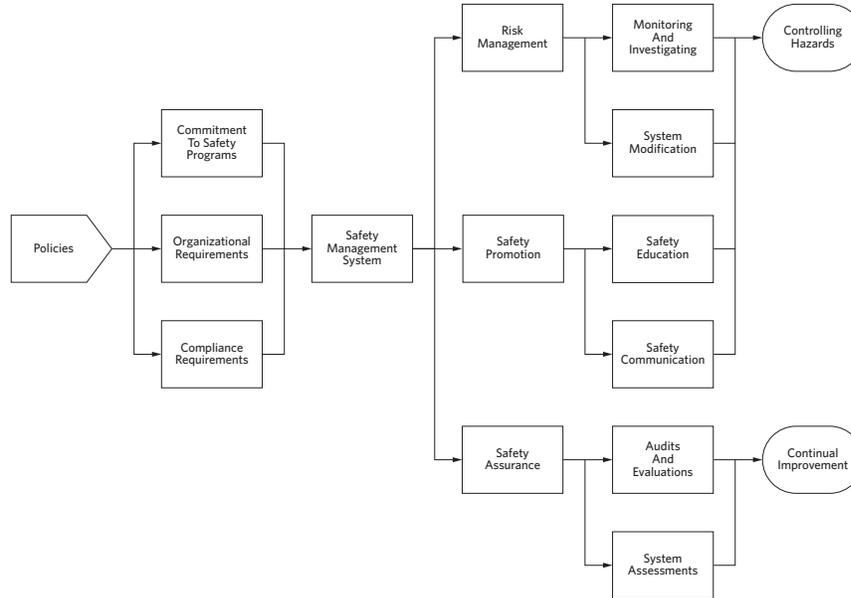
- 4.6.1 Federal Aviation Regulations and Advisory Circulars [1].
- 4.6.2 ICAO Regulations (Annex 13).
- 4.6.3 NTSB Regulations (14 CFR 49 Part 830-831).
- 4.6.4 Airline Operations Specifications.
- 4.6.5 Airline corporate policies and procedures.
- 4.7 Procedures and Controls

The Aviation Safety Department maintains procedures to accomplish the objectives of the Safety Policy. This document addresses details on the planning and implementation process to support the safety management policies and the Aviation Safety Department objectives. (Please see sections 4.2 and 4.9.4 for more information.)
- 4.8 Emergency Preparedness and Response
  - 4.8.1 The Aviation Safety Department identifies the potential for accidents and incidents through proactive data analysis programs. The procedures for data analysis are located in *ASM 5.0 [8]*.
  - 4.8.2 The Aviation Safety Department staffs a team of investigators to respond to accidents and incidents on a 24/7 basis. All investigation procedures and protocols are located in *ASM 4.0 [7]*.
  - 4.8.3 The Emergency Planning and Operations Department (under Corporate Safety, Security, and Compliance) is responsible for scheduling periodic exercises to rehearse the corporate response to a major aircraft accident. The Manager – Aviation Safety Investigations coordinates the participation of the Aviation Safety Department in these exercises with the Manager – Emergency Planning and Operations prior to the event. Emergency response procedures are located in the *Airline Emergency Operations Manual (EOM)*.
- 4.9 Documentation and Records Management
  - 4.9.1 General Requirements: The Aviation Safety Department has documented and established the following procedures.
    - A. Safety Policies as documented in *section 4.2* of this manual.
    - B. Safety Management System planning requirements and related procedures and processes as detailed in *section 4.4*.
    - C. Authority and responsibility as detailed in *section 4.4*.
    - D. Safety Management System outputs as detailed in *section 7.2*.

- 4.9.2 Aviation Safety related procedures and processes are the collective responsibility of individual Aviation Safety Department management and staff. It is the responsibility of each functional area manager to ensure a safe work environment.
- 4.9.3 Aviation Safety manuals have detailed documentation describing interfaces and interactions between each safety process and procedure affecting the Safety Management System.
- 4.9.4 The Aviation Safety Department objectives are to:
  - A. Conduct investigations efficiently and effectively.
  - B. Review and assess conformance to Aviation Safety policies and procedures.
  - C. Communicate safety information to leadership and employees.
  - D. Provide periodic reports to senior management.
  - E. Continuously improve customer satisfaction.
- 4.9.5 Document Management: Procedures are established and maintained for controlling Aviation Safety documents detailed in *ASOP 2.2 [4]*.
- 4.9.6 Records Management: All records are legible and identifiable to either a specific project or process. Such records are filed in an orderly, well-indexed, and logical fashion that facilitates easy retrieval.
  - A. The original copy of a record is stored and maintained as the official record. This official record is used in investigations of non-conformance, corrective action, process conditions, or document changes.
  - B. Aviation Safety maintains legible records to verify conformance to, and the effective operation of, the Safety Management System. These records are collected, indexed, filed, and stored in a suitable environment to prevent damage, deterioration, or loss. Records may contain documents from external sources.
  - C. Procedures are established and maintained for controlling all Aviation Safety records detailed in *ASOP 2.3 [5]*.

4.10 Figure 1: Safety Management System Summary

Please see *Figure 1* for a graphical summary of the Safety Management System program.



**Figure 1 Graphical summary of the Safety Management System.**

## 5 Safety Risk Management

### 5.1 System Analysis

5.1.1 The purpose of conducting this analysis is to identify potential hazards.

5.1.2 The analysis should consider the following:

- A. How this system interacts with other systems.
- B. Those general tasks to be performed by the individual employee(s).
- C. The effect of environmental and cognitive stressors on employee performance.
- D. Interaction of the employee with hardware and software components of the system.

5.1.3 At a minimum, a systems analysis shall be performed for the following events:

- A. Initial designs of systems, organizations, and/or products.
- B. Changes to existing system designs.

- C. New operations/procedures.
- D. Modified operations/procedures.

5.1.4 Any assumptions made during the analysis should be clearly identified.

## 5.2 Identify Hazards

5.2.1 Identifying Hazards: These methods include, but are not limited to:

- A. Voluntary safety reports.
- B. Reports required by the company.
- C. Formal investigations.
- D. Input from subject matter experts.
- E. Analysis of training, operational, and employee performance data.
- F. Industry sources.

5.2.2 Processing Hazards: Once employees within the Aviation Safety Department identify a hazard, they must inform the Director – Aviation Safety. The Director then makes a determination on whether to use the “Normal” or “Fast-Track” process.

### A. Normal Process:

- 1) Once a hazard has been identified to Aviation Safety, it is added to the Integrated Safety Round Table (I-SRT) Action Log and a tracking number is assigned. (Please see *section 8* for more information.)
- 2) The item is presented to the I-SRT during the next scheduled meeting (or an emergency meeting which may be called by the Director – Aviation Safety).
- 3) If, following appropriate discussion, the I-SRT determines the item warrants further consideration, it is assigned to the appropriate division(s) for analysis and possible action. (Please see *section 5.3* for more information.)
- 4) The I-SRT determines the status of the item during the next scheduled meeting and updates the Action Log.

B. Fast-Track Process: If the Director – Aviation Safety determines that immediate action is required, he or she contacts the appropriate division representative and communicates the concern. The business leader then determines and implements the action(s) that must be taken immediately. The Director – Aviation Safety adds the item to the I-SRT action log for detailed review in accordance with the “Normal Process.”

5.3 Analyze Safety Risks

- 5.3.1 The division assigned to consider an item for possible action should perform the following steps in order:
- A. Conduct a “Safety Risk Assessment” of the hazard and document the finding on the I-SRT Action Log. (Note: This is a mandatory step. Please see *section 5.4* for more information. Also note that *section 5.5* applies if the risk is determined to be “Unacceptable.”)
  - B. Gather related information. (Note: This may include conducting a formal investigation.)
  - C. Determine causal factors.
  - D. Identify costs and benefits associated with possible solution options.
  - E. Conduct substitute risk assessment (if applicable). (Please see *section 5.5.3*.)
  - F. Implement risk controls and record this information on the I-SRT Action Log. (Note: This is a mandatory step.)
  - G. Provide an update to the Integrated Safety Round Table. (Note: This is a mandatory step.)
- 5.3.2 The assigned division is responsible for ensuring the I-SRT Action Log is updated one week prior to the next scheduled meeting. All significant decisions (including rationale) and actions (after completion) should be included on the Action Log.

5.4 Assess Safety Risks

- 5.4.1 The purpose of conducting a formal safety risk assessment is to prioritize items competing for limited resources and to identify hazards requiring special handling. (Reference *section 5.5* for special handling requirements for items rated as “Unacceptable.”)
- 5.4.2 Risk assessment is integral to an effective SMS and is used to assist business leaders and managers in making decisions that affect the safety of the operation. The risk assessment tool described in this section can be used to assess the risk from an actual event (i.e. a runway excursion) or a potential event (a reported slippery runway that could result in a runway excursion). In the latter scenario, a reasonable assessment should be made that will produce a credible outcome; the worst case scenario should not be assumed.
- 5.4.3 The division/organization assigned to review a hazard by the I-SRT conducts a formal “Safety Risk Assessment.” It is up to the division to develop the associated processes for the assessment, but, at a minimum, it will include the components outlined below and must be endorsed by a “business leader” (as defined by the Human Resources Competency Code indicated on the individual’s job description).

5.4.4 Each hazard is evaluated for likelihood and severity in five dimensions: injury to personnel, damage to the environment, damage to assets, potential increased costs or revenue loss, and damage to the reputation of the corporation.

A. Likelihood Levels:

- 1) "A" Unknown, but possible in the aviation industry.
- 2) "B" Known in the aviation industry.
- 3) "C" Occurred in the company.
- 4) "D" Reported more than three times per year within the company.
- 5) "E" Reported more than three times per year at a particular location.

B. Severity Levels:

1) Physical Injury:

- a) "0" No injury.
- b) "1" Minor injury (less than a "serious injury").
- c) "2" Serious injury defines any injury which:
  - i) Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received.
  - ii) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose).
  - iii) Causes severe hemorrhages or nerve, muscle, or tendon damage.
  - iv) Involves any internal organ.
  - v) Involves second, or third-degree burns, or any burns affecting more than 5% of the body surface.
- d) "3" Single fatality.
- e) "4" Multiple fatalities.

2) Damage to the Environment:

- a) "0" No effect.
- b) "1" Minor effect (event is immediately addressed with available materials and does not result in fines or violations).
- c) "2" Contained effect (event does not extend beyond an Airline Leasehold and does not cost more than \$50,000, including fines).
- d) "3" Major effect (if any of the following conditions apply):
  - i) Event extends beyond an Airline Leasehold.
  - ii) Event does not extend beyond an Airline Leasehold but costs more than \$50,000.

- iii) Event results in a Notice of Violation from a regulatory agency.
- e) “4” Massive effect (if any of the following conditions apply):
  - i) Event costs more than \$1 million, including fines.
  - ii) Event negatively affects human health.
  - iii) Event diminishes the ability of the community to enjoy the environment.
  - iv) Event causes irreversible damage to the environment.
- 3) Damage to Assets:
  - a) “0” No damage.
  - b) “1” Minor damage (less than \$50,000).
  - c) “2” Substantial damage (from \$50,000 to less than \$250,000).
  - d) “3” Major damage (from \$250,000 to less than \$1 Million).
  - e) “4” Catastrophic damage (\$1 Million or greater).
- 4) Potential Increased Cost or Revenue Loss
  - a) “0” No increased cost or lost revenue.
  - b) “1” Minor loss (less than \$50,000).
  - c) “2” Substantial loss (from \$50,000 to less than \$250,000).
  - d) “3” Major loss (from \$250,000 to less than \$1 Million).
  - e) “4” Catastrophic loss (\$1M or greater).
- 5) Damage to Corporate Reputation:
  - a) “0” No implication.
  - b) “1” Limited localized implication.
  - c) “2” Regional implication.
  - d) “3” National implication.
  - e) “4” International implication.

5.4.5 Determination of Risk Acceptability:

- A. “Acceptable” (acceptability rating = 1; color code = green; Reference *section 5.4.4* for specific combination of likelihood and severity that results in this rating): Accepted without further action, but may be an area for continuous improvement.
- B. “Acceptable with Mitigation” (acceptability rating = 2; color code = amber; Reference *section 5.4.4* for specific combination of likelihood and severity that results in this rating): Accepted under defined conditions of mitigation.
- C. “Unacceptable” (acceptability rating = 3; color code = red; Reference *section 5.4.4* for specific combination of likelihood and severity that results in this rating): Further

work is required to design an intervention that eliminates the associated hazard or controls the factors that lead to higher risk likelihood or severity.

5.5 Control of Safety Risks

- 5.5.1 This section applies to all items rated as possessing “Unacceptable” levels of risk during the Safety Risk Assessment process.
- 5.5.2 For each item in this category, the corrective action will include at least one of the following controls (in order of preference):
  - A. Design the hazard out by modifying the system (this includes hardware/software systems, physical hazards, and organizational systems).
  - B. Install physical guards or barriers that reduce exposure to the hazard or reduce the severity of consequences.
  - C. Issue warnings, advisories, or signals for the hazard.
  - D. Make procedural changes to avoid the hazard or to reduce likelihood or severity of the associated risk.
  - E. Provide training to avoid the hazard or to reduce the likelihood of an associated risk.
- 5.5.3 Substitute Risk Assessment: After the risk control is designed, but before it is implemented, an assessment must be made to determine if it will introduce a new hazard into the system. If the result of this analysis determines risk will be reduced to an “acceptable” level, the system may be placed on line with the control in place.
- 5.5.4 Review:
  - A. All items falling into this category will be reviewed by Aviation Safety between six and twelve months following the implementation of the control strategy.
  - B. The follow-up review will be documented on the I-SRT Action Log.

5.6 Figure 2: Risk Assessment Matrix

Please see *Figure 2* for a graphical summary of the risk assessment strategy.

SEVERITY LEVELS						LIKELIHOOD LEVELS				
RATING	PHYSICAL INJURY	DAMAGE TO THE ENVIRONMENT	DAMAGE TO ASSETS	POTENTIAL INCREASED COST OR REVENUE LOSS	DAMAGE TO CORPORATE REPUTATION	A UNKNOWN BUT POSSIBLE IN THE AVIATION INDUSTRY	B KNOWN IN THE AVIATION INDUSTRY	C OCCURRED IN THE COMPANY	D REPORTED >3X/YR WITHIN THE COMPANY	E REPORTED >3X/YR AT A PARTICULAR LOCATION
0	No Injury	No Effect	No Damage	No Increased Cost Or Lost Revenue	No Implication	ACCEPTABLE				
1	Minor Injury	Minor Effect	Minor Damage < US \$50K	Minor Loss < US \$50K	Limited Localized Implication					
2	Serious Injury	Contained Effect	Substantial Damage < US \$250K	Substantial Loss < US \$250K	Regional Implication	ACCEPTABLE WITH MITIGATION			UNACCEPTABLE	
3	Single Fatality	Major Effect	Major Damage < US \$1M	Major Loss < US \$1M	National Implication					
4	Multiple Fatalities	Massive Effect	Catastrophic Damage ≥ US \$1M	Massive Loss ≥ US \$1M	International Implication					

Figure 2 Graphical summary of the risk assessment strategy.

5.7 Figure 3: Safety Risk Management Process

Please see *Figure 3* for a graphical summary of the safety risk management process.

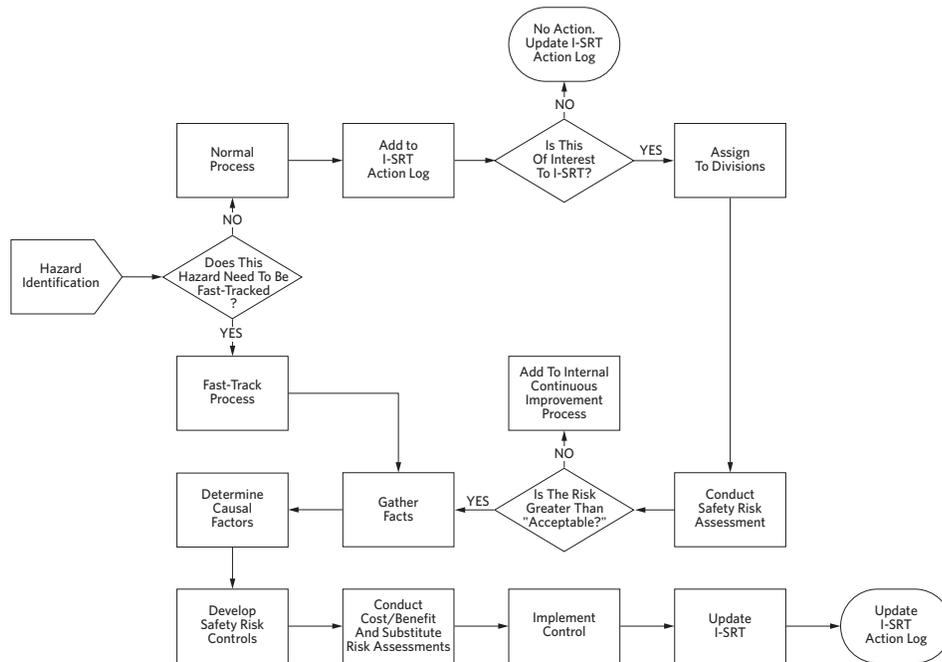


Figure 3 Graphical summary of the Safety Risk Management process.

## 6 Safety Assurance and Internal Evaluation Process

### 6.1 General Requirements

Aviation Safety has procedures in place to ensure that risk controls, once designed, continue to conform to the associated requirements and that they continue to be effective in maintaining risk within acceptable levels. This includes the ability to:

- 6.1.1 Identify new hazards.
- 6.1.2 Measure the effectiveness of safety risk controls.
- 6.1.3 Ensure compliance with regulatory requirements.

### 6.2 System Description

Safety assurance activities will include a review of the System Analysis processes listed in *section 5.1* as well as examples (where applicable) of specific applications of this process to the following types of events:

- 6.2.1 Initial designs of systems, organizations, and/or products.
- 6.2.2 Changes to existing system designs.
- 6.2.3 New operations/procedures.
- 6.2.4 Modified operations/procedures.

### 6.3 Information Acquisition

6.3.1 Aviation Safety collects and analyzes data from multiple sources. These include, but are not limited to, formal audits/evaluations, employee self-reporting programs, operational reports, aircraft data, investigations, and contact with other personnel within the industry. The ability to gather and analyze data in a timely fashion enables Aviation Safety to provide effective recommendations and continuously monitor the safety health of the organization. This includes the ability to:

- A. Assess conformity with safety risk controls as described in *section 5*.
- B. Measure the effectiveness of safety risk controls developed in accordance with the processes of *section 5*.
- C. Assess system performance.
- D. Identify hazards.

6.3.2 Self Audits:

- A. The Director – Aviation Safety will ensure the operational processes of the department meet the following goals:
    - 1) Conform to the safety risk control processes published in the Aviation Safety Manuals (ASMs).
    - 2) Assess the performance of the safety risk controls implemented by the department.
  - B. This program shall:
    - 1) Require at least one audit during each six-month period (e.g., January-June and July-December) for each of the functional areas within the Aviation Safety Department.
    - 2) Evaluate all processes documented in the Aviation Safety Manual in accordance with current regulatory guidance material and IOSA standards.
    - 3) Be conducted by members of the Aviation Safety Department who are selected by the Director. (Note: Selection preference will be given to personnel who are certified to conduct audits.)
    - 4) Ensure the auditor does not inspect his or her own work.
    - 5) Include a follow-up (additional audit) within two months for any area found not to comply with either internal or regulatory guidance.
  - C. The Manager – Safety Management Systems documents all audit activities including:
    - 1) Which area was audited.
    - 2) When the audit was conducted.
    - 3) Who performed the audit.
    - 4) List of findings.
    - 5) List of required corrective actions.
    - 6) Information associated with the implementation of corrective actions.
- 6.3.3 Corporate Internal Audit and Evaluation: The Corporate Compliance and Quality Department resides within the Corporate Safety, Security, and Compliance Division and is tasked with conducting internal quality audits as part of the corporate Quality Management System (QMS). These audits are scheduled and conducted in accordance with current Corporate Compliance and Quality Department policies. Please see *Policy Manual [9]* for a description of associated policies and procedures.
- 6.3.4 External Audit of the Safety Management System: The Corporate Compliance and Quality Department within the Corporate Safety, Security, and Compliance Division coordinates external audits. This department receives and maintains audit reports. The agencies or organizations conducting these audits include:

- A. The Department of Defense.
- B. Audit Organizations (AOs) conducting IOSA Operational Safety Audits (IOSAs).
- C. The Federal Aviation Administration.
- D. Foreign aviation authorities.

6.3.5 Investigations:

- A. The Aviation Safety Department utilizes a team of Aviation Safety Investigators to conduct safety investigations of accidents, incidents, irregularities, issues, and trends. The Aviation Safety Investigators are the primary liaison with the NTSB (or comparable foreign investigation agency) during formal accident and incident investigations.
- B. Aviation Safety investigations are conducted in accordance with *ASM 4.0 [7]*. These procedures are aligned with the following investigation regulations and manuals:
  - 1) ICAO Annex 13 – Aircraft Accident and Incident Investigation.
  - 2) ICAO Manual of Aircraft Accident Investigation.
  - 3) 14 CFR Part 830-831 (NTSB Regulations).
  - 4) NTSB Major Investigations Manual and Appendices.

6.3.6 Employee Reporting and Feedback System

- A. The Aviation Safety Department provides the following reporting systems for the Airline employees:
  - 1) Telephonic Aviation Safety Hotline (1-800-xxx-xxxx). (Note: The employee may choose to remain anonymous.)
  - 2) Electronic Aviation Safety Hotline at [www.Airline.com](http://www.Airline.com). (Note: The employee may choose to remain anonymous.)
- B. The telephonic and web-based Aviation Safety Hotline reports are routinely monitored and analyzed to determine significant safety issues and trends.

6.4 Analysis of Data

The Aviation Safety Department maintains and promotes the use of voluntary safety reports to identify hazards within the system. Analysis of the following data sources are used to evaluate the effectiveness of these programs:

6.4.1 Electronic Hotline Reports.

6.4.2 Web-based Hotline Reports.

6.4.3 De-identified Aviation Safety Action Program (ASAP) Reports.

6.5 System Assessment

6.5.1 The Director – Aviation Safety shall assess the performance of the SMS against its requirements.

6.5.2 The assessment will be conducted concurrently with the Self Audit described in *section 6.3.2*.

6.5.3 System assessments shall result in a finding of:

- A. Conformity with existing risk controls and SMS requirements.
- B. Nonconformity with existing risk controls and SMS requirements.
- C. New hazard(s) identified.

6.5.4 The Safety Risk Management process (*section 5* of this manual) will be utilized if the assessment indicates:

- A. The identification of new hazards.
- B. The need for system changes.

6.5.5 The General Manager – Flight Safety maintains a record of all system assessments.

6.6 Preventive/Corrective Action Process

6.6.1 This process is used to address either non-conformity with current risk controls or potential non-conformity with risk control actions.

6.6.2 These actions are developed, prioritized, and implemented in the same manner as outlined in *section 5.2.2*.

6.6.3 All corrective actions are tracked utilizing the I-SRT Action Log.

6.7 Management Reviews

The Director – Aviation Safety, through a standing agenda item at the quarterly I-SRT meetings, conducts a review of the SMS. The review includes:

6.7.1 Assessment of the quality of the Safety Risk Management process.

6.7.2 Assessment of the quality of the safety assurance processes.

6.7.3 Assessment of the need for change to the administrative processes of the Safety Management System.

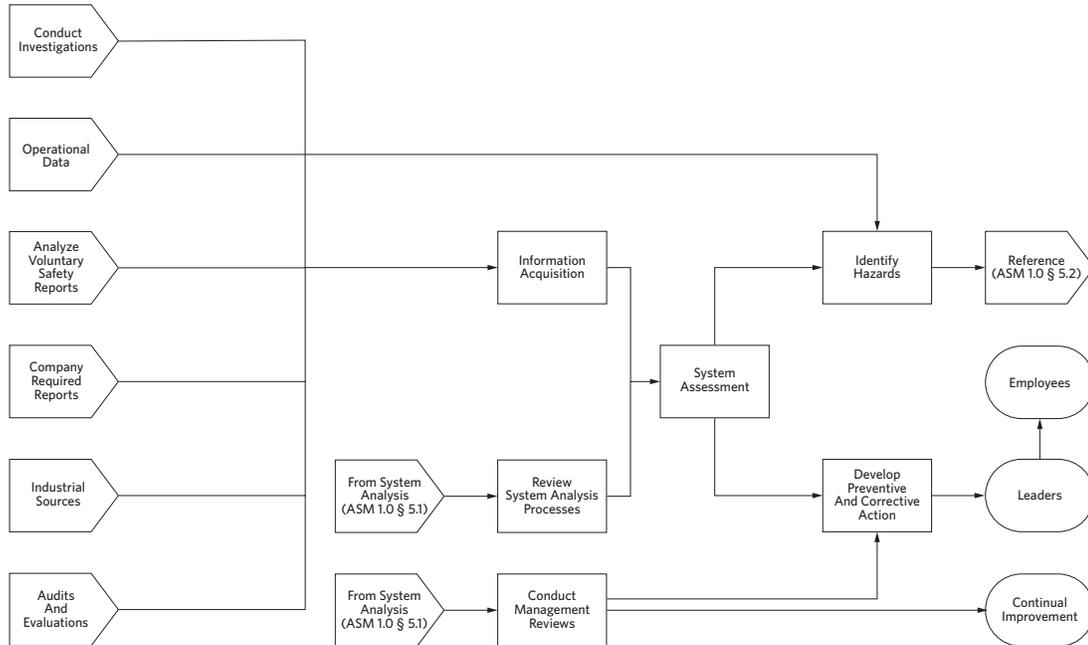
6.7.4 Lessons learned.

6.8 Continual Improvement

The Aviation Safety Department shall continuously improve the effectiveness of the SMS and of safety risk controls through the use of safety and quality policies, audit and evaluation results, analysis of data, preventive and corrective actions, and management reviews.

6.9 Figure 4: Hazard Identification, Safety Assurance, and Internal Evaluation

Please see Figure 4 for a graphical summary of the hazard identification, safety assurance, and internal evaluation processes.



**Figure 4 Graphical summary of the hazard identification, safety assurance, and internal evaluation processes.**

7 Safety Promotion

7.1 Safety Culture

Senior leadership is dedicated to promoting the growth of a positive safety culture. The Aviation Safety Department promotes and communicates safety information to the employees by the following methods:

7.1.1 Publication of the safety and non-punitive hazard reporting policies stated in *section 4* of this manual and a safety mission statement which is communicated and distributed throughout the organization.

7.1.2 Publications, communications, and safety information distributed to the employees that contain safety related data, including incidents, goals, and completion ratios.

7.1.3 Demonstration of the commitment to the SMS through distribution and publication of safety and SMS awareness products.

7.1.4 An effective employee reporting and feedback system that ensures confidentiality.

## 7.2 Communication and Awareness

Outputs of the SMS are communicated to the Airline employees through the following methods:

7.2.1 Aviation Safety Reporter.

7.2.2 Aviation Safety Bulletin Boards.

7.2.3 Aviation Safety Portal (Intranet Site).

7.2.4 Integrated Safety Round Table presentation and Action Log.

7.2.5 Safety Bulletins.

7.2.6 Aviation Safety Investigation Reports.

7.2.7 Ad hoc reports and presentations.

## 7.3 Personnel Requirements (Competence)

All Aviation Safety team members will possess the qualifications described in the Quality Manual, *ASM 2.0 [2]* and their respective Job Descriptions.

## 7.4 Training

7.4.1 All Aviation Safety team members will receive initial and recurrent (annual) SMS training. The General Manager — Flight Safety is responsible for developing and administering an acceptable training program commensurate with the individual's level of responsibility and influence on the safety of Airline.

7.4.2 The General Manager — Flight Safety ensures training currency through an effective record-keeping system.

## 7.5 Safety Lessons Learned

The Director – Aviation Safety ensures that safety lessons learned are developed from the output of the SMS. These lessons shall be used to promote continuous improvement of safety. Aviation Safety communicates lessons learned through the methods described in *section 7.2*.

## 8 Integrated Safety Round Table

The Safety Round Table (SRT) committees are the centerpieces of the Safety Management System (SMS) at the Airline. These groups are charged with the development of a unified strategy to deal with safety issues at the divisional and corporate levels.

### 8.1 Organizational Structure and Responsibility

Each division participating in the SMS program designates at least one representative from each of the functional areas (i.e., training, scheduling, operations, etc.) to meet once per quarter. These groups are referred to as the divisional SRT. If a safety issue extends beyond the divisional area of responsibility, these groups may either partner with other divisions to address a specific hazard (i.e., running divisional processes in parallel) or refer the issue to the Integrated SRT (I-SRT). (Note: If divisions decide to run multiple processes in parallel for the same event, the I-SRT representative for those divisions is still responsible for briefing the I-SRT and logging the actions taken on the I-SRT action log.) The I-SRT committee members are usually operational leaders from those divisions participating in the SMS program. They are charged with:

- 8.1.1 Reviewing systemic hazards from a cross-division perspective.
- 8.1.2 Assigning responsibility for accomplishing safety action to specific individuals.
- 8.1.3 Monitoring the efficacy of the SMS program.
- 8.1.4 Providing status reports to the “accountable executive.”

### 8.2 Meeting Components

The Aviation Safety Department facilitates the quarterly I-SRT meeting. (Note: Additional meetings may be necessary to address time critical issues and can be scheduled by any I-SRT member.) Each regularly scheduled meeting will include the following elements:

- 8.2.1 Old Business: To review/discuss previous administrative items as appropriate.
- 8.2.2 New Business:
  - A. Data analyses and trends.
  - B. Incident/accident investigations, findings, and recommendations.
  - C. Discussion items from each member.
- 8.2.3 Action Log:
  - A. Review all open items.
  - B. Review all items submitted for closure since the previous meeting.
  - C. Discuss all new items and assign responsibility for each (if applicable).

8.2.4 Management Review: To ensure this process adds value to the corporation and continues to improve, the following items will be discussed during each meeting.

- A. Quality of the Safety Risk Management process.
- B. Quality of the Safety Assurance processes.
- C. Quality of other administrative processes associated with the SMS.
- D. Lessons learned this quarter from the SMS program.

8.3 Action Log

8.3.1 I-SRT Action Log Process:

- A. General: The log is maintained by the Aviation Safety Department and serves as the official record of the I-SRT process. All members present at a meeting must agree to any changes to the action log (i.e., adding new items, assigning responsibility for an item, or closing an item). Once approved by all present members, the Action Log is submitted to the Accountable Executive by the VP – Corporate Safety, Security, and Compliance for final approval.
- B. Administrative: The I-SRT members are responsible for submitting additions/modifications to the Action Log to the General Manager — Flight Safety no later than one week prior to a scheduled meeting of the I-SRT. The General Manager — Flight Safety is responsible for maintaining the integrity of the log and ensuring the log complies with the document control procedures described in *ASOP 2.2 [4]*.

8.3.2 I-SRT Action Log Contents:

- A. Tracking Number.
- B. Short description of item or action taken.
- C. Individual assigned responsibility.
- D. Risk acceptability rating.
- E. Method of hazard notification.
- F. Date added to the log.
- G. Date of requested completion.
- H. Date actually completed.
- I. Number of days from assignment to I-SRT meeting date or closure.
- J. Status.

8.4 Current Membership

The current voting members of the I-SRT are:

- A. Managing Director – Division 1.
- B. Director – Division 2.
- C. Director – Division 3.
- D. Director – Division 4.
- E. Director – Division 5.
- F. Director – Division 6.
- G. Vice President – Division 7.
- H. Managing Director – Division 8.

**End**