

Can Regulators be Confident that an FRMS Provides an Acceptable Level of Safety?

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Short Answer



YES

Where does the Authority start?



Development of Aviation



Today



FRMS in Operation

Some of the details the Regulator needs to consider

- **Aesthetics vs. Substance**
- **Performance Indicators**
- **When to say "No"**

Aesthetics



- Management eye candy
- Flashy power points
- Overly detailed reporting forms
- Manual that feels familiar
- Perfect paperwork
- Waffle

Substance

- Manual that feels relevant to the operator
- Balanced and appropriate communication
- Clear fatigue reporting process
- Reporting forms developed for the operation
- Assurance finding
- Access to all

How to tell the difference

- Evaluate the processes by asking to be shown how the process works in operation
- Question to test understanding
- Uniform message from CEO to junior crewing officer
- Feedback system in place
- Assurance – findings tracked and closed
- Continuous improvement
- “How we do business” attitude

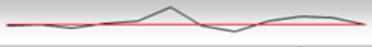
In summary it's the **“People”** that make the difference

Performance Indicators



- These are not performance indicators for an FRMS!
- Performance indicators need to be varied and take a total system approach

These are

SAFETY PERFORMANCE INDICATORS - FRMS (CAUSAL FACTORS TO FATIGUE NORMALISED AGAINST TOTAL FLYING DUTIES FOR MONTH)							
	Fatigue Indicators	Benchmark 2011	Trend	Jun-11	Prev month	3 month	12 month
Roster Related	Insufficient Rest	0.50		0.79	0.64	0.62	0.53
	Long Day One Early	0.71		0.55	0.64	0.55	0.72
	Consecutive Long Duties	0.53		0.55	0.76	0.70	0.62
	Sub Optimal Rest Duration	0.25		0.44	0.57	0.59	0.42
	Long Final Day Duty	0.30		0.42	0.41	0.40	0.35
	Consecutive 4 Sector Days	0.45		0.41	0.86	0.71	0.56
	E - L Transition	0.43		0.38	0.44	0.49	0.40
	Sub Optimal Night Duty	0.23		0.23	0.20	0.17	0.23
	Sub Optimal Rest Timing	0.12		0.16	0.12	0.10	0.13

- Roster metrics (inc. use of Commander Discretion
- Fatigue Reporting
- Internal surveys / research
- LOSA
- ASR
- MOR
- (models)

When to Say No (or maybe “not yet”)



- As a State you are not ready
- Operator has already has compliance issues
- Lack of Senior Management commitment
- A limit too far

Areas to consider which could lead to No (or not yet)

- Unbalanced use of statistics or science
- Lack of understanding of individuals' involvement and how they will be treated
- Reverse engineering the result
- Lack of feedback
- Rushed implementation
- Unclear policy and commitment
- Lack of resources
- Don't pass the show me test

Summary

- Need to identify the commitment to FRMS throughout the organisation to get beyond the aesthetic
- Performance indicators must be relevant and useful
- “Not yet” rather than No – The State needs to be ready first, and the Operator needs to demonstrate fatigue management before fatigue risk management

Thank You

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