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Safety Recommendation:

CHCI, with external input, should conduct a review of its SMS and ensure that the design of its processes and procedural adherence are sufficiently robust to maximize the safety dividend; this review should consider extant risk assessments and a thematic examination of the corpus of all safety information available to the Operator, both internally and externally.

Response:

On 24 July 2018 CHCI informed the Investigation that:

“As part of continued internal safety oversight of CHCI, we have engaged with two independent aviation SMS specialists to carry out compliance audits as per EASA ORO.GEN.200 requirements. To complement this we will continue to carry out corporate SMS oversight audits.

In addition all SMS processes are currently being subjected to a rigorous review in order to ensure that their design and subsequent procedural adherence are sufficiently robust to maximize the safety dividend. This review will consider extant risk assessments and a thematic examination of the corpus of all safety information available to CHC Ireland, both internally and externally. The results and output of the review will be the subject of analysis by an experienced independent aviation safety expert.

These various activities will ensure CHCI’s SMS continues to meet all regulatory, contractual and internal safety requirements.”

On 1 February 2022, and in subsequent engagement, the Operator provided the following update:

"Two independent reviews of the SMS were completed with no significant findings. As part of the continuous improvement element of the SMS, further work has also been undertaken and completed on a number of topics including:

Revision and updating of bow-tie risk assessments relating to IAA alleviations/exemptions;

A complete review of the operational Safety Case;

Revision of safety management and compliance monitoring manual (SMCMM), with the latest version submitted to/approved by the IAA in November 2020;

Further development of internal safety alert and external information sharing protocols to ensure as broad a range of safety inputs as possible is achieved.

A Flight Data Monitoring program has also been introduced as part of the further strengthening of the SMS.

However, notwithstanding the significant work and improvements undertaken since 2017, the operator will ensure with external input that an additional review is carried out, including a thematic examination of the corpus of all safety information available to the Operator, and is sufficiently robust to maximize the safety dividend in light of the additional information contained in the final report. The operator expects to complete this work by September 2022. "

AAIU Comment:

The AAIU notes the 24 July 2018 response of CHC Ireland awaits further updates on this ongoing work.

The AAIU notes the Operator's response of 1 February 2022.

The Investigation notes that bow-tie assessments for alleviations were completed and also understands that the complete review of the operational Safety Case was carried out using the bow-tie methodology. In November 2020 the Operator informed the AAIU that it had taken the bowtie methodology to a new level and introduced a process called field-focused inspections, which it said was effectively a monthly audit in addition to the audit programme. The Operator explained that this field-focused inspection process involved giving a number of the controls on the bowtie picture to the frontline staff and ask them to assess how effective, partially effective or ineffective that particular barrier is. The Operator explained that the model was settled on as the best concept and the most worthwhile, that FFI was necessary to avoid bowtie becoming an administrative burden that couldn't be an effective part of the safety management system. The Operator said, in November 2020, that the field-focused inspection process was being rolled out in Ireland.

However, when the AAIU asked for details of the FFI inspections in Ireland since November 2020, the Operator stated that the FFI program has not yet been implemented in CHCI due to restrictions on our activity during the past two years. It said that FFI is a supplementary aspect to the Bowtie principles that are in place in CHCI and will feature in the FY23 SMS Improvement Plan.

The AAIU is concerned that the Operator's current safety cases and assessments in Ireland lack the FFI component which the Operator itself stated was required to make it an effective part of the safety management system. The AAIU is of the opinion that the Operator should urgently commence the field-focused inspection programme which it said was being rolled out in November 2020.

The AAIU notes the Operator's commitment to carry out an additional review, with external input, of its SMS including a thematic examination of the corpus of all safety information available to the Operator, to ensure that its SMS is sufficiently robust to maximize the safety dividend in light of the additional information contained in the final report.

The AAIU considers the status of this Safety Recommendation to be 'In process of implementation'.

