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Safety Recommendation:

CHCI should ensure that appropriate time is provided within the roster to facilitate staff attendance at safety-related meetings and that the minutes of all safety related meetings are stored in a manner that facilitates their incorporation into the knowledge base of safety information within the company.

Response:

On 01 February 2022, and in subsequent engagement with the AAIU, the Operator provided the following response to this Safety Recommendation:

"In the latest accepted SMCMM the model of base safety meetings has changed. We now have dedicated SAO's appointed to run base safety meetings. When conducted they are run during normal shift patterns on base. Dedicated SAO's allows for appropriate time to facilitate the meeting and for robust standardisation and recording of meeting minutes in the company SMS database.

This change to the SMCMM is only recently accepted by the IAA, and is also reflected in amended contractual requirements. Output from base safety meetings will be included in Safety Review Board presentations.

However, in tandem the evolution of Safety Management Systems continues to promote the use of 'real-time' reporting of safety hazards and occurrences. Any safety event (reactive or proactive) is reported into the SMS at the time in order for it to then be treated as part of the new Daily Safety Risk Management(DSRM) process and allow relevant actions to be taken. This also further ensures the incorporation into the knowledge base of safety information within the company."

AAIU Comment:

The AAIU Notes the Operator's response of 01 February 2022.

The AAIU notes the Operator's comments regarding the promotion of 'real-time' reporting. Whilst acknowledging the desirability of real-time reporting, the AAIU also notes that reporting alone cannot be the driver of an operator's safety culture i.e. safety culture must exist and be fostered in parallel with, but independently of, the reporting system. This is necessary to avoid a situation where receiving a small number of reports could compromise an operator's safety culture. A significant factor in this situation is the Operator's use of monthly Base Flight Safety Meetings (BFSMs) chaired by the Base Flight Safety Officer, a rated SAR practitioner, with Flight Safety training, who would be known to and trusted by the base pilots and technical crew.

The AAIU notes the demonstrated relevance and importance of the monthly base flight safety meetings given that the Final Report identified that BFSM minutes recorded a number of safety concerns which were not entered in SQID. Furthermore, the ICAO Safety Management Manual notes the 'the valuable input that the production and operational units could bring to the organizational safety decision-making process', and warns of the possible shortcoming of centralised Safety Management.

From the Operator's response it was not absolutely clear that monthly BFSMs, chaired by a rated SAR practitioner, with Flight Safety training, were still part of the Operator's SMS—the AAIU believes it is essential that they are. Furthermore, the Operator informed the AAIU, on 25 November 2020, that 'we have put metrics in place because the lead investigator raised the issue and so we have put in place a metric that shows whether the meetings are taking place and whether the minutes are being documented and whether they are being uploaded into SQID'. Accordingly, it is a matter of record that the Operator tacitly accepted the importance of holding, minuting and storing within SQID, monthly BFSMs chaired by the Base Flight Safety Officer.

Whilst acknowledging that the SAOs referred to in the Operator's response will undoubtedly strengthen the safety management apparatus, and provide support to the Flight Safety Manager and the Base Flight Safety Officers, the AAIU asked the Operator for confirmation that monthly BFSMs chaired by the Base Flight Safety Officer remain an integral part of its SMS.

The Operator responded to the AAIU stating that 'Base Safety Meetings are an integral part of the operator's SMS and remain so. However, the format and structure is adapting to changes in technology, improved processes and culture. The operator initiated a Daily Safety Risk Management meeting (DSRM) in 2017. This DSRM is fully transparent and engages reporters from across the business in real time. Output from this is communicated to all staff via weekly updates (new initiative). This provides almost real time feedback to all staff on all safety reports. Formalised daily shift briefs and shift risk assessment (new initiative) are now firmly embedded in the organisation. This brings safety into the daily lives and conversations of operational staff.'

The Operator also stated that it 'acknowledges the view of AAIU. Safety meetings will be held bi-monthly and chaired by dedicated Safety Assurance Officers providing continuity, consistency and standardisation of processes. This coupled with new safety initiatives now firmly established, provides for an overall improved and more transparent real time SMS. The effectiveness of changes will be monitored during SRB.'

The AAIU acknowledges the Operator's feedback, but remains concerned that halving the incidence of BFSMs, allied to the move to SAO chairing BFSMs rather than SAR practitioners from each base, is sub-optimal for the reasons cited above.

The AAIU considers the status of this Safety Recommendation to be 'Partially accepted, closed'.