

Safety Recommendation Number:	IRLD2021017
AAIU Event Reference:	IRL00917016
AAIU Report Number:	2021-008
Date of Publication of Safety Recommendation:	5 November 2021
Safety Recommendation Status:	Implemented, closed

Safety Recommendation:

The Minister for Transport should ensure that proposed changes to IRCG operating procedures are the subject of a risk assessment or safety case, that any mitigations required are in place prior to implementing the changes, and that SOPs are updated in a timely fashion to reflect any such changes.

Response:

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

"On behalf of the Minister I would like to convey the following:

The recommendation is accepted.

The Coast Guard, in its role as a helicopter tasking authority, has implemented a series of measures that provide for greater clarity and more robust decision making by IRCG Rescue Coordination Centre staff, and which more explicitly incorporate risk assessment procedures to be followed.

All IRCG operating procedures and any subsequent revisions will be subject to risk assessment as part of the Coast Guard's Safety Management System which incorporates a number of rigorous quality controls. All aviation related operating procedures will be the subject of a risk assessment or safety case, and any mitigations deemed required will also be in place prior to implementing a proposed change. Furthermore, SOPs will be updated in a timely fashion to reflect any necessary change.

New governing procedures concerning document management and change control will be applied to all Coast Guard Standard Operating Procedures (SOPs). A Quality Assurance Officer has been appointed to assist with overseeing compliance with the requirements of these new procedures.

The change control process requires that all new operating procedures be the subject of a Risk Assessment (RA), or that alternate information (safety case) be provided by each document's author prior to progressing through the document approval process, to ensure that any mitigations required are in place prior to implementing a proposed change, and that SOPs are updated in a timely fashion to reflect any such changes.

An update will be provided to the AAIU in Q4 2022 on the migration of Coast Guard controlled documents to the new system's (Document Control – management and change control) requirements."

On 19 September 2023, the Department of Transport provided the following update for this Safety Recommendation:

"Operations section of the Coast Guard operates a document control procedure and retains a record of SOP development and amendment. The procedure for initiating, developing and promulgating Ops notices is captured in a specific SOP.

A Risk Assessment methodology for all new operating procedures was developed in 2022 and utilised in the development of a new SOP. This system will be applied to all new SOPs and any amendments to aviation related SOPs."

AAIU Comment:

The AAIU notes the Minister's response of 01 February 2022.

The AAIU also notes the Q4 2022 timescale for further update.

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

The AAIU notes the Minister's response of 19 September 2023.

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