

<b>Safety Recommendation Number:</b>	IRLD2021027
<b>AAIU Event Reference:</b>	IRL00917016
<b>AAIU Report Number:</b>	2021-008
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<b>Safety Recommendation Status:</b>	In process of implementation

**Safety Recommendation:**

The Minister for Transport should ensure that the IRCG fully implements a Safety Management System which encompasses all aspects of its air operations and which includes all stake holders in those operations.

**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 has established a Safety and Quality Compliance Section within its organisation structure, staffed with a Health and Safety Officer and Quality Assurance Officer, who are developing an effective and functioning Safety Management System, applicable to the specific needs of the IRCG and in adherence with the mandatory requirements of ISO 45001:2018 - Occupational Health and Safety Management Systems.*

*The Coast Guard's safety statement published in 2021 outlines in detail the key processes and structures that now support the organisation's revised Safety Management System (<https://www.gov.ie/en/publication/ce37b-irish-coast-guard-safety-statement/>).*

*Further, the Department of Transport's Internal Audit Unit working in conjunction with external expertise also completed a pre-certification audit in relation to the Coast Guard's application for certification under ISO 45001 in December 2021. Within the corresponding report is detailed that:*

*'On the basis of the work completed the Department's Internal Audit Unit (IAU) is of the view that the steps taken by IRCG to develop and implement an effective & functioning Safety Management System sees them well placed to apply for and achieve ISO 45001' ...and that 'No matters of a systemic nature were identified'*

*The Coast Guard's Safety Management System will encompass all aspects of its air operations, and which includes all stakeholders in those operations.*

*A Safety Management System Interface Document (SMSID) has been developed to set out the arrangements for the coordination and management of safety issues applicable to the CHCI Helicopter contract. This document*

*provides the means by which the Operator and the Coast Guard can demonstrate that they identify in so far as is reasonably practical, hazards and risks to safety that may arise from Coast Guard helicopter operations.*

*A Safety and Quality Compliance section (SQC) has been established in the Coast Guard to support the development of an effective Safety Management System (SMS); this includes aviation safety.*

*A Safety Management System Interface Document (SSID) has been implemented to govern the relationship (as it pertains to safety management) between the Coast Guard and the operator. This document details how the operator and Coast Guard can identify and communicate any hazards and risks to safety that may arise from Coast Guard helicopter operations.*

*Furthermore, the organisation recognises the requirement to further embed air operations within its SMS. To this end it is intended to include explicitly in an SOP a specific and recognised process applicable to post-tasking analysis by SMCs and SAR Coordinator/SAR Managers to provide such personnel the means with which to monitor system performance, identify potential risks and action any opportunities for continuous improvement. Governance of this process will be provided in the Standard Operating Procedure (SOP) which will details roles, responsibilities and gives structured guidance concerning pre tasking risk assessment, post-tasking debriefings and/or incident reviews that have involved the use of aviation resources. A revised SOP will be provided Q 4 2022."*

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

*"The Coast Guard has an established Safety Management System (SMS) across the organisation laid out in procedures, manuals and staff operations notices. This SMS in use in one Coast Guard section (Volunteer sector) has been accredited to the international standard ISO 45001:2018 Occupational Health & Safety Management Systems. A project to implement the accredited SMS into the rest of the Coast Guard, including Operations Section has commenced and is expected to be completed by the end of 2024.*

*IRCG will continue to address the Aviation specific aspects of SMS as set out in ICAO Annex 19 and associated documents and regulations.*

*A further update will be provided in Q1 2024."*

**AAIU Comment:**

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

The AAIU also notes the Q4 2022 timescale for a revised SOP.

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 notes the timescale of Q1, 2024 for further updates.

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