

SMS resilience under commercial pressure

Panel 4

EASA Safety Conference – Helsinki – 05 November 2019

Your safety is our mission.

Panellists and moderator



Jon Horne
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ECA



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Safety risk
manager
easyJet



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Flight Operations
Director
EASA



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President
CAA Poland



Jari Nisula – moderator
President
Risk in Motion



S M S



SMS weaknesses:

1. Top management...
2. “Drift” (normalization of deviance)



How to build resilience in SMS?



WTO

Investors

ICAO

EASA

Countries

NAAs

Cities

Operators

Oil traders

Customers

IATA

Unions

Environmental groups

IFALPA

Safety

Military

Financial

Political

Environmental

Best places to intervene:

- **Paradigms**: mind-set behind the goals, structure, rules, parameters
- **Goals**: purpose of the system
- **Self-organization**: power to add, change or evolve system structure
- **Rules**: incentives, punishments, constraints
- **Information flows**: who has access?

Prescribe → Experiment & adapt

COMPETITION

INVESTORS

REGULATORS

COMPETITION

Shareholders

Board

TARGETS

INCENTIVES

Executive team

COMPANY

Jon's key themes:

- Resilience - **Acknowledge & Account** for commercial pressure, can't 'proof' against it
- **Encourage** and **Embrace** the **Human element**
- **Look for indicators** of commercial pressure – you can't see what you don't look for!



What does “resilience” look like?

- Does not defy reality – works within it
- Bends under pressure rather than breaking
- Continues to function even in degraded state, or sub-optimal environment
- Does not, can not change environment
- What does this mean for an SMS in commercial world?



Checklist

- Flotation devices
- Phone
- Tools
- Map
- Bungs/Plugs
- Tell someone route
- Standard procedures
- ...

Do you just “look inside the boat”?

- In the context of SMS, where you try to define the risks you foresee, and mitigations for them, it can be easy to only ‘look inside the boat’
- Just deal with what’s in front of you, what’s on your nice checklist?
- Do you develop procedures and mitigations for risks it’s easiest to develop them for, and certainly only for those you look for?
- It is easy to think the world you have imagined and chosen to monitor is all the world there is...
- “Stay within the SMS and you will be safe” – leave it to compliance and the safety manager and forget about it...



But what's *outside* the boat?

- How do you capture and address this?
- If a bigger, broader threat than the scope of your SMS is out there, how do you even see it and its effects?
- One major answer is to engage with the real world work as it is done, not as you imagined and predicted for
- **Speak to the people in the boat**, who can see what's around them and how it adds up
- Use your human element, on the front line
- Why is that not a given?

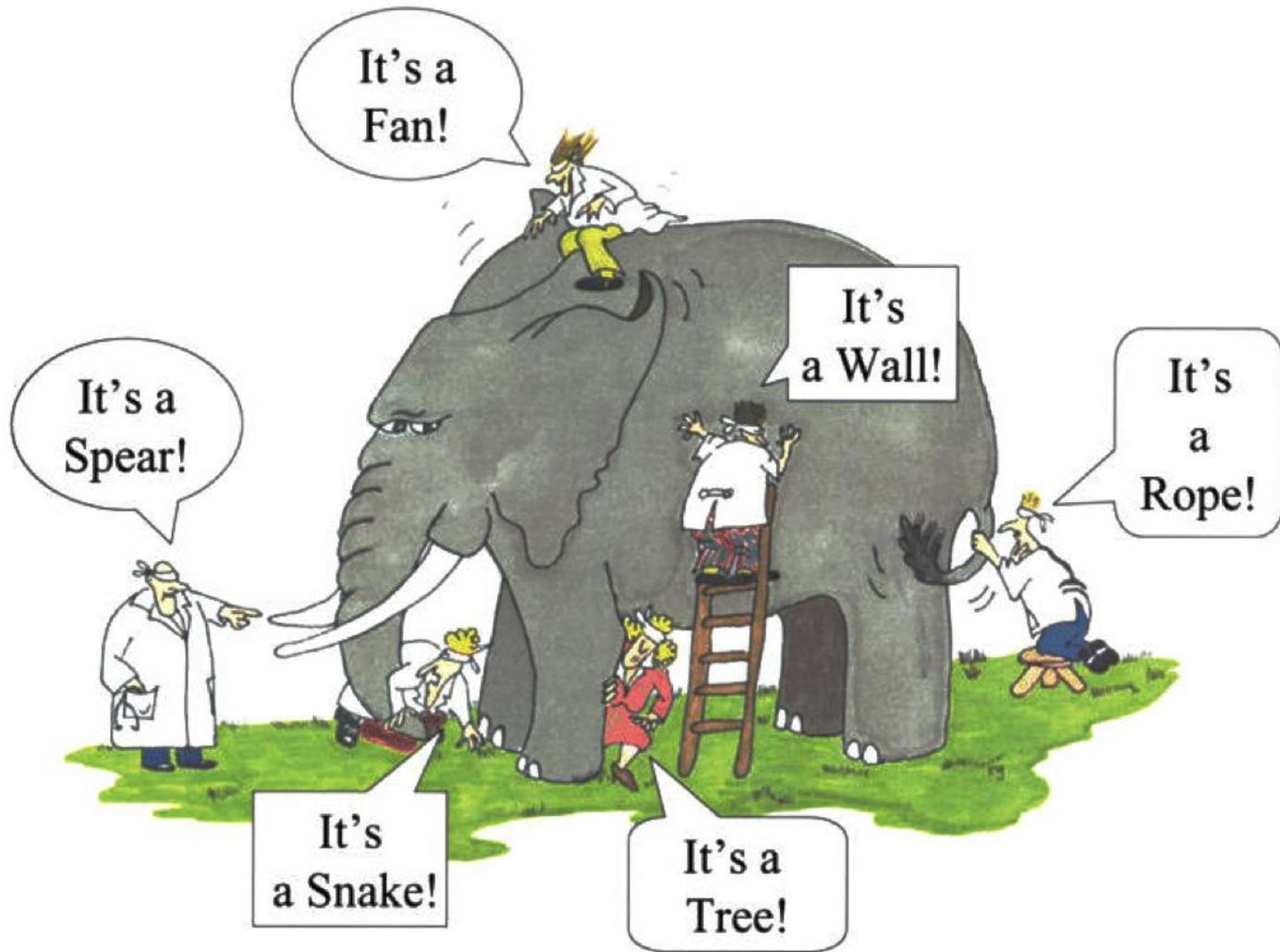
THE WAY I FEEL
IS HARD TO
QUANTIFY!

HOW HARD -
ON A SCALE
OF ONE TO
TEN?



Don't retreat to just quantitative data

- Quantitative data is 'easy', it is 'clean' .
- It is relatively simple to gather, and monitor, and can be automated. It is therefore definitely ONE foundation of a good SMS, but...
- It is very tempting to retreat to a comfort zone of quantitative data.
- Even using the supposed need for it to dismiss other inconvenient information such as human experience or illuminating 'anecdote' that doesn't come easily quantified.
- So don't make your safety information fit a data-only SMS
- Make the SMS ready to accept all the useful information it can, especially the human element.



Does data in your SMS show the true picture?

- It definitely does not tell you the whole picture! It tells you about specific points of your operation, only where & when you measure them
- When you rely on it you will miss the whole picture – the human element is one of few ways to see the wider context & how all those data points sit together
- Commercial pressure is definitely one of those giant sharks or elephants
 - there isn't a single way to measure it; it has subtle and disparate influences all over an operation; it tends to arrive as a creeping menace, little by little as your commercial environment changes, making it difficult to spot.
- But I guarantee you your pilots and front line staff will, long before the management or a regulator
- So build into your SMS a way for them to tell you. Even if you don't want to hear it, consult them, encourage them, don't dismiss their concerns.



How do you see Commercial Pressure?

- It doesn't announce itself.
- Or come with a label, or an icon
- In fact for this presentation, the best representation I could come up with was this – my '*commercial pressure (cooker)*'
- How then will you spot it?



You cannot see what you don't look for!!

- If you want an SMS that is resilient to commercial pressure (and you should), you need an SMS that *can* notice it in the first place
- We've already said you can't measure it directly, so how do you look for it?
 1. Ask human beings, your front line staff, face to face where and if they see it having an influence
 2. Specifically reference it with a facility to highlight it as a factor in routine safety reports, and welcome hearing about it
 3. Use proxies: sickness rates; safety budgets per head, per ASK or per hull; safety report keywords; requests or for safety related spend – rejections being a major flag
- If you aren't looking, you can't see it, you can't mitigate or address it, and, eventually, your first indication will be when it falls on your head...

Magnus's key themes:

- For an SMS to be effective, it needs to be written and communicated in a style which reflects the type of language/discourse used by its audience.
- There will be more than one single audience for the SMS within each organisation. Therefore, multiple versions of the SMS will need to be available, with language tailored for each audience.
- During its creation, an effective SMS requires that organisations use not only SMS experts but also communication experts.



SMS resilience in ATM



**SMS resilience as
you imagined it**

Resilience in SMS

Are we competent to manage safety and risk?

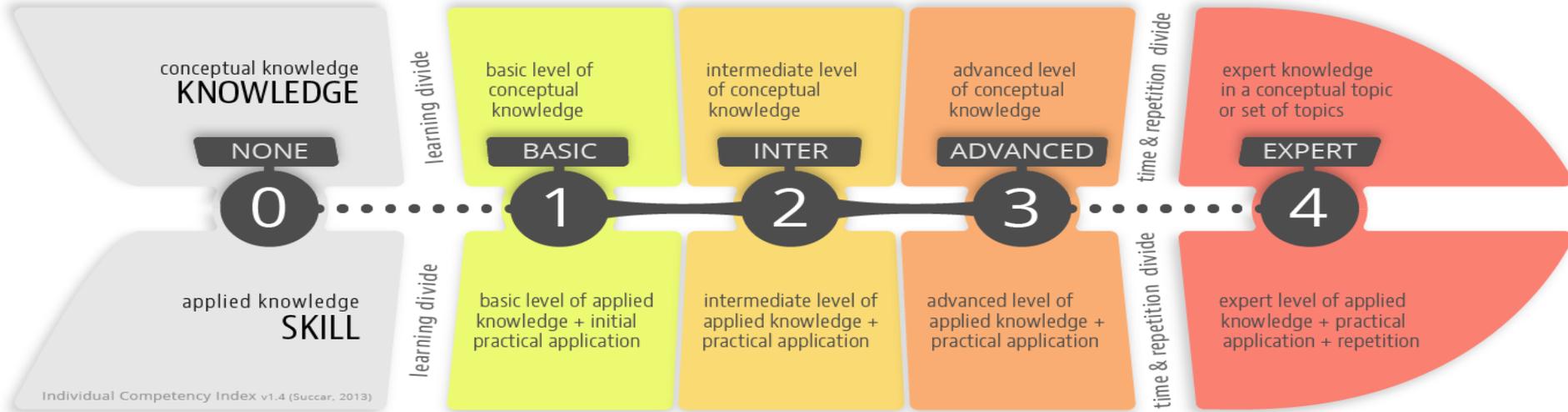
Brendan Booth

Safety Risk Manager

To be or not to be competent...



To be or not to be competent...





Panel 4 - "Enhancing SMS resilience when faced with commercial pressure" (1/4)

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Competency for safety and risk management - Do you think your Accountable Manager, Nominated Person or Safety Manager has the knowledge and skill to oversee risk and safety management?

Yes



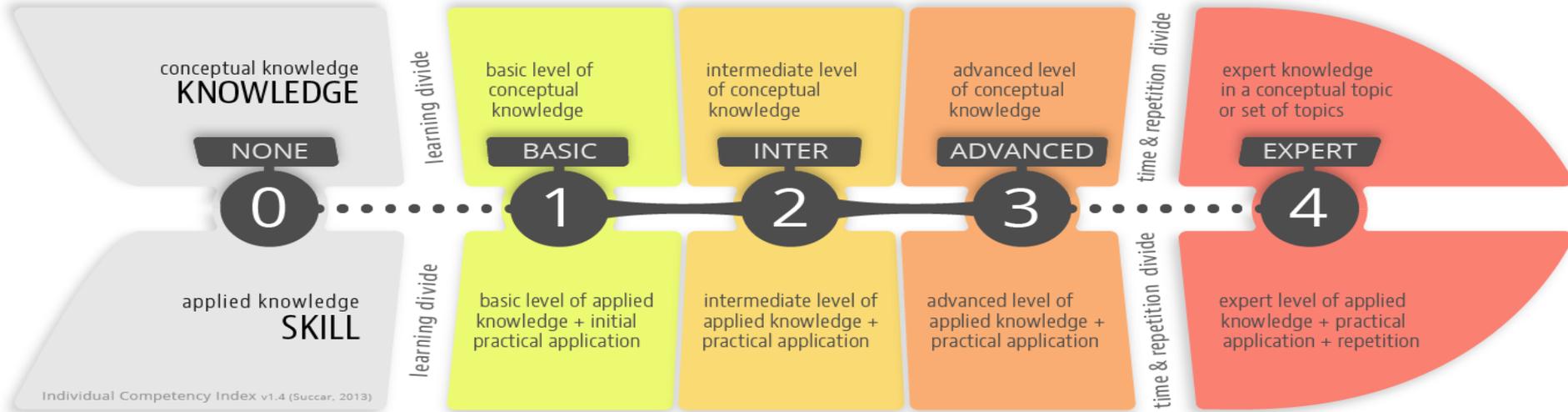
No



Partially



To be or not to be competent...





Panel 4 - "Enhancing SMS resilience when faced with commercial pressure" (2/4)

1 0 1

Competency for safety and risk management: Safety and Risk management requires us to have sufficient knowledge and skill. How should these criteria be implemented?

EASA should define them and make it a requirement to demonstrate organisational competency



EASA should require organisation to define competency and demonstrate they meet it



A vertical photograph of a person sitting on the very edge of a dark, overhanging rock ledge. The person is silhouetted against a bright sky. Below the ledge, a deep blue lake is visible, surrounded by rugged, green mountains. The overall scene is dramatic and evokes a sense of risk and adventure.

**Be brave.
Take risks.
Nothing
can substitute
experience.**

Paulo Coelho

Jesper's key themes:

- Senior management **commitment** and safety **leadership** needed
- Implementation and oversight not yet at the expected level
- EASA **toolbox** to foster a **more effective SMS**

Senior management buy-in

FROM

“SMS
because it is
the rule”



TO

“Being
prepared;
anticipate,
accept the risks;
or restrict
operations”

Engage; protect and support the safety leaders



Panel 4 - "Enhancing SMS resilience when faced with commercial pressure" (4/4)

057

Question for the Competent Authority: are the airlines' SMS mature enough?

Yes



Partially

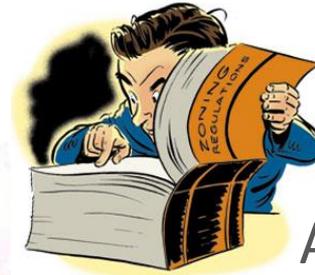


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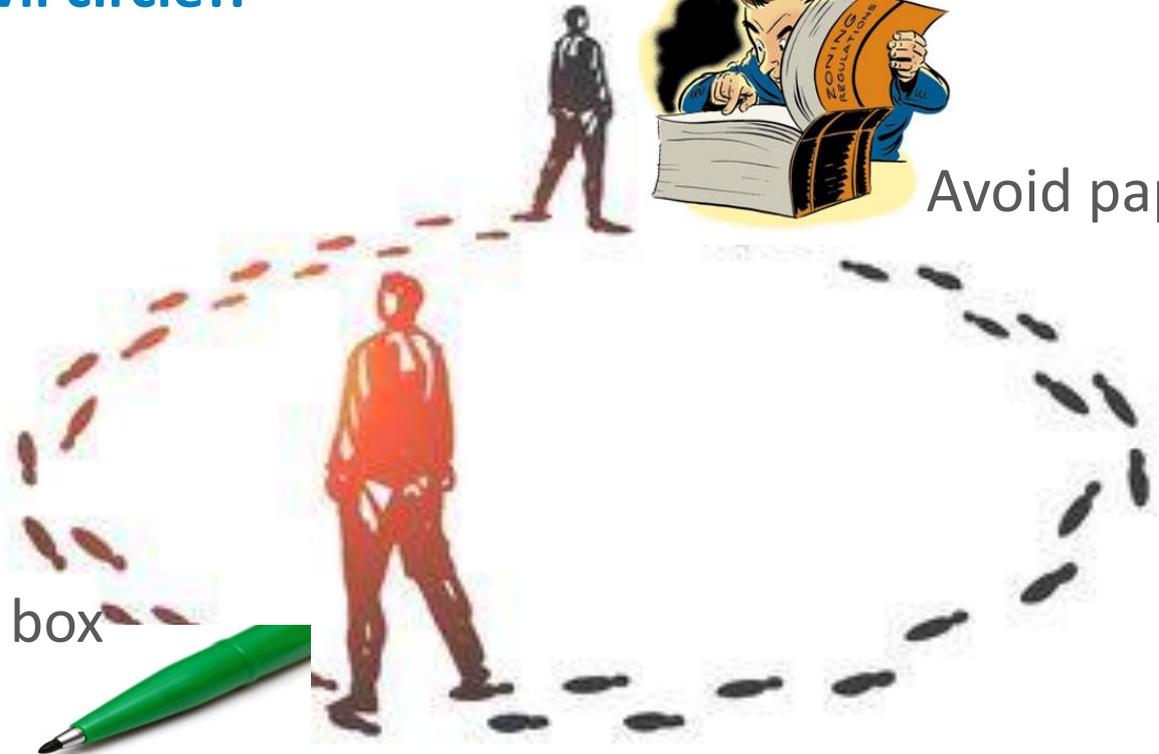


NAA maturity in (S)MS oversight

Get out of the evil circle!!



Avoid paper tiger



Avoid ticking box





Panel 4 - "Enhancing SMS resilience when faced with commercial pressure" (3/4)

090

Question for the airline: is your NAA competent enough to assess your (Safety) Management System?

Yes



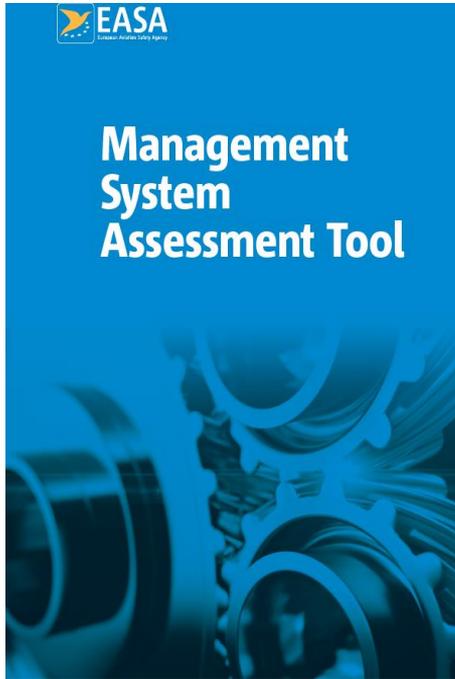
Partially



No



EASA to facilitate a more effective SMS implementation



Air OPS SMS workshop, Feb.2019

<https://www.easa.europa.eu/newsroom-and-events/events/air-ops-sms-workshop>

How to...

- Train
- Build experience
- Improve effectiveness



...download the tool trolley and takeaways

Piotr's key themes:

- Low cost operations does **NOT** mean low safety operations.
- Lack of SMS findings does **NOT** mean high safety operations.
- Multidisciplinary background among Board of Directors as well as learning culture within an organisation strengthen SMS resilience.



***„How to build more resilience to SMS in the face
of commercial pressure”***

Regulator and Top Management perspective

Existing Paradigm

not true



LOW COST = LOW SAFETY

not true

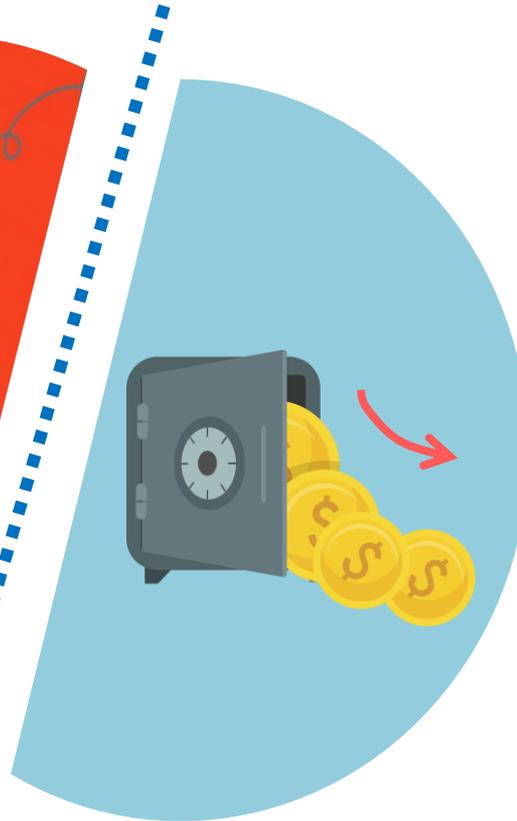


LACK OF SMS FINDINGS =
HIGH SAFETY OPERATIONS



Key SMS message to the Financial Director:

10.000 USD saved
on safety activities
now....



... 100.000 USD
lost in the
future profits.

Factors that weaken SMS resilience at the top management level

01 Lack of multidisciplinary background among top management members (board of directors)



02 Lack of learning culture within the organization

03 Shareholder pressure for profits (enhanced by politicians and financial investors)

End of slides

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