RACCA
REGIONAL AIR CARGO CARRIERS ASSOCIATION

SSMS

Simplified Safety Management System

Revised 6/18/14

A simplified safety management system designed for regional cargo operators

TABLE OF CONTENTS AND LIST OF EFFECTIVE PAGES

FOREWORD to be deleted from operators' manuals. . . .

RACCA's "SSMS" manual was edited and reorganized in 2012 to embody features developed in cooperation with Flight Safety Foundation, and drawing some features from RACCA's earlier "SMS Lite" document. Our intent is to provide operators with a simplified means of implementing Safety Management Systems when mandated by the FAA and ICAO, taking advantage of the inherent benefits of SMS and risk management concepts, but avoiding the increasingly complex and potentially counterproductive process requirements seen in many proposed SMS programs.

SSMS is not intended to be a "plug and play" document. Filling in the blanks in SSMS is not enough. We cannot over-emphasize the importance of your company embracing the fundamental concepts of SMS, training your personnel in their implementation, and YOU developing, implementing, and continuing to use a Safety Management System suited to, and useable by, YOUR company. An SMS manual that keeps your FSDO happy but sits on the shelf and never gets used is worse than nothing at all!

Material in this SSMS in [boldface surrounded by brackets] requires individual companies to insert their own company names or appropriate text. Editing, rewriting, deleting, and expanding upon this document will be necessary to tailor it to your company's needs – or it may simply serve as the basis for developing a SMS that is entirely your own based upon the principles here and in other available guidance.

This RACCA "SSMS" basis document was composed in MS Word using simple formatting, with the intent that individual operators will adjust it as necessary to conform to their own manual formats. The manual is available electronically on the RACCA Website.

The material is available for use without limitation to RACCA members. Regional Air Cargo Carriers Association asserts that reasonable care and diligence was exercised in its preparation. The Association assumes no responsibility or liability in connection with its use.

Richard Mills
John Hazlet
RACCA Safety Committee
August 2012

[COMPANY NAME]

SAFETY MANAGEMENT SYSTEM MANUAL

Section 1
Safety Policy and Objectives

Safety Policy and Management Commitment
As [PRESIDENT, CHIEF EXECUTIVE OFFICER, ETC.] of [COMPANY NAME], I wish to state this company's commitment to providing our employees with a safe work environment. The concept of a "safety culture" at [COMPANY NAME] begins with me. I have put this Safety Management System in place as a means of achieving that goal. This Safety Management System is published in [MANUAL, CHAPTER – WHATEVER THIS DOCUMENT IS CALLED IN YOUR OPERATION]. While perfection is difficult to achieve, it is [NAME OF COMPANY]'s goal to strive toward it, with an interim objective of continual improvement in the safety of our operations.

It is the policy of [COMPANY NAME] that employees report unsafe conditions and do not perform work related tasks if the work is considered unsafe. Employees must report accidents, injuries, and unsafe conditions to the Safety Officer or appropriate manager responsible for the type of activity involved. If you don't know who to make the report to, the Safety Officer will take care of it or forward it as necessary.

With regard to such reports, [COMPANY NAME]'s policy is that no such report will result in retaliation, penalty or other disincentive.

[SIGNATURE]
[PRINTED NAME AND TITLE]

Safety Accountability
Every employee of the company is accountable for safety. We cannot maintain a safe workplace unless we follow safe practices. We cannot address safety problems unless they are identified and reported. To that extent, everyone who works here from the [TITLE OF CHIEF EXECUTIVE] on down is accountable for maintaining a safe work environment in [NAME OF COMPANY]'s operations. This document will help us reach that goal.

Recommendations to improve safety will be given thorough consideration by the Safety Officer and other appropriate company managers. If deemed necessary, they will then be forwarded to

appropriate executives or the [PRESIDENT, CEO, ETC.] of [COMPANY NAME] for further review and implementation.

[COMPANY NAME] will give top priority to the identification and correction of unsafe conditions.

Corrective Action
While retaliatory action by [COMPANY NAME] for reporting safety issues is prohibited, we will take corrective action against any employee who willfully or repeatedly engages in unsafe activities or disregards admonitions of supervisors to cease them. This action may include remedial training, verbal or written reprimands and may ultimately result in termination of employment.

Applicability
The [COMPANY NAME] Safety Management System applies to the following company activities:

- Flight Operations

[SELECT ADDITIONAL ACTIVITIES FROM THE LIST BELOW OR ADD OTHERS AS APPROPRIATE]

- Flight Following
- Aircraft Maintenance and Inspection
- Facility Maintenance
- Line Service
- Aircraft Fueling
- Office and Administrative Activities
- Use of company vehicles

Management of Change
With inevitable changes in regulations, procedures, and personnel, [COMPANY NAME] will review its operations and make changes as necessary to stay abreast of current conditions and in compliance with applicable rules.

In the event of change of senior management personnel (including the CEO), the Safety Officer will brief the new manager on the Safety Management system. If the new manager is the [CEO, PRESIDENT, ETC.] the name and signature on the "Safety Policy and Management Commitment" statement at the beginning of this manual will be revised.

Section 2
Safety Officer

[COMPANY NAME] has established the position of Safety Officer to monitor company activities from a safety standpoint, identify areas where corrective measures are needed to ensure continued safety, and recommend improvements. The name of the person currently assigned as Safety Officer appears in the [COMPANY OPERATIONS MANUAL OR OTHER DOCUMENT].

Safety Officer Qualifications
The [COMPANY NAME] Safety Officer will either be an appropriately certificated and rated pilot who is – or has been – trained, qualified and current [IN AT LEAST ONE MAKE AND MODEL OF AIRCRAFT OPERATED BY <COMPANY NAME>], or an FAA certificated mechanic or aircraft dispatcher who is thoroughly knowledgeable as to all aspects of the company's operations. It is not necessary that a pilot be currently qualified in company aircraft. [OPERATORS MAY ELECT TO SET DIFFERENT QUALIFICATIONS FOR THEIR SAFETY OFFICERS THAN THESE RECOMMENDATIONS, BUT IT IS IMPORTANT THAT THE PERSON HAVE ENOUGH EXPERIENCE, KNOWLEDGE, AND STANDING IN THE COMPANY TO DO THE JOB]

Safety Officer's Mandate
The Safety Officer's mandate is – on an ongoing basis – to consider the following fundamental safety questions, formulate responses to them, and coordinate corrective and followup action as appropriate with the [PRESIDENT, CEO, ETC.]:

1. What is most likely to be the cause of this company's next accident or serious incident?
2. How do we know that?
3. What action shall we take to prevent, or minimize the possibility of, that occurring?
4. How will we confirm that the action to prevent or minimize that possibility is working, or make adjustments to improve its effectiveness if necessary?

In connection with this mandate, the Safety Officer will:

- Maintain a voluntary safety reporting system for use by employees
- Conduct periodic company safety inspections to support Questions 1 and 2 above
- Develop appropriate remedial actions to support Question 3 above
- Maintain a followup program to address Question 4 above

Section 3
Reporting of Accidents, Incidents and Hazards

[This reporting system should be developed to suit the individual operator, kept as simple as possible, but contain the following elements:

1. **Provisions for safety reports to be confidential if requested by the person reporting the issue**
2. **Keeping records of safety reports**
3. **Means to contact the person reporting the issue for additional information if necessary**
4. **Incorporating records of how each issue was addressed or disposed of (note that in some cases, "filed with no action" may be an appropriate response)**
5. **Means to advise the person reporting the issue as to what action was taken]**

Section 4
Safety Promotion and Training

[Operators should provide means to familiarize their employees with their responsibilities regarding participation in the SMS. This can be done in the form of a flyer passed out at time of hire (or to existing employees when the system is implemented), incorporation in the personnel manual, or by means of verbal briefing. This should be kept short and simple.]

Section 5
Accident/incident Analysis

The Safety Officer's role in analysis following a company accident or safety-connected incident is to examine the event in the context of the four questions in the Safety Officer's Mandate in Section 2 above:

1. Now that the accident or incident has occurred, was it within the area where we expected a problem?
2. If it was, why didn't our remedial action work? If it wasn't, what can we do to prevent (or minimize the possibility of) a future, similar occurrence?
3. Then the appropriate remedial action should be implemented or changes made to current remedial action

Section 6
Risk Management

A fundamental purpose of SMS is "risk management": Simply stated, we look for potential problems, evaluate why we think they are potential problems, develop means to eliminate or minimize the problems, and monitor or modify our corrective actions to insure that they're working.

The following matrix tools are commonly used to evaluate risk and assess what (if anything) is to be done about it.

Risk Assessment Matrix

Probability → / Consequences ↓		Extremely Improbable 1	Extremely Remote 2	Remote 3	Probable 4
Catastrophic	**4**	4 Review	8 Unacceptable	12 Unacceptable	16 Unacceptable
Critical	**3**	3 Acceptable	6 Review	9 Unacceptable	12 Unacceptable
Moderate	**2**	2 Acceptable	4 Acceptable	6 Review	8 Unacceptable
Negligible	**1**	1 Acceptable	2 Acceptable	3 Acceptable	4 Review

Event probability is ranked from 1 to 4 along the top edge, most likely at the right. Severity is ranked from 1 to 4 along the left edge, most severe at the top. Risk evaluations that result in classification in the lower grey area of the table are acceptable. In the white area, they should be subjected to continuing review – preferably until they are moved into the lower grey area by remedial action. Risk levels are numbered in the individual cells of the matrix, and calculated by multiplying the "probability" number by the "severity" number, with 1 being the least risky, and 16 being the most risky. The Safety Officer may assign a risk level in the course of evaluating Safety Reports and take appropriate action.

> For example (referring to the Risk Assessment Matrix above), if the probability was "extremely remote" (2) and the consequences "moderate" (2), multiplying 2 x 2 = 4. This would fall in the lower grey "acceptable" area. Referring to the Risk Action matrix below, this places the event at the upper end of the "minimum risk" level. Recommended action is to proceed after considering all elements of risk.

Risk Action Matrix

VALUES	RISK LEVELS	ACTION
1-4	Minimum Risk	Proceed with no remedial action after considering all elements of risk
6-12	Moderate Risk	Continue after taking action to manage overall risk
16	High Risk	**STOP:** Do not proceed until sufficient control measures have been implemented to reduce risk to an acceptable level

Use of these matrices must be applied with the understanding that pages in a manual cannot substitute for application of informed common sense. Note that if we evaluate the risk to have a value between 1 and 4, we have made the conscious decision that this activity or event is part of our normal operation, and reasonable caution on the part of the people involved will result in a good safety record. On the other hand, a risk level of 16 requires that we immediately cease the activity in question. This is where experience, informed judgment, and careful evaluation will establish a good balance between risk and benefit.

Section 7
Management Review

Management review
The Safety officer will periodically review results of SMS activities with department managers and the company CEO. These reviews will specifically include:

- Safety issues and associated risk levels identified since the previous meeting
- Corrective/mitigation actions taken
- Results of followup on previous issues
- Request for input from managers

Frequency of these reviews will be determined by the Safety Officer on the basis of number and urgency of issues.

Looking Ahead
SMS is not intended to be a "reactive" program – where we evaluate problems that have already occurred and deal with them. An important element of SMS, and of risk management specifically, is being ***pro***active: In other words, employees and managers should all be on the lookout for practices, processes, customs, procedures, products, or equipment that contain potentially dangerous elements . . . and identify them *before* they cause a problem . . . in other words, a safety-oriented company culture.

Often, opportunities to be proactive arise from employee reports and suggestions, beginning operations on unfamiliar routes, to new airports, with new kinds of aircraft, in new facilities, commencing maintenance or line service activities with new kinds of equipment, etc. It is important that company managers and supervisors be a part of identifying and solving these kinds of potential problems, and instill in their employees the importance of doing so, before they have a chance to hurt someone or interfere with the company's operations.