

Internal Evaluation Program (IEP) Safety Assurance Check

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SMS is becoming widely accepted in the helicopter industry. As organizations move from the early stages to maturity, the focus turns to assuring a continuous safe operation. Once risk controls are firmly in place, the responsibility rests with top management to ensure that the processes and procedures are functioning as intended. An Internal Evaluation Program (IEP) is the prescribed pathway for achieving this within an SMS.

Internal evaluation is a critical component (Safety Risk Assurance) of an SMS, and an integral part of the quality assurance system. It validates the processes, procedures, and controls an organization puts into place and helps ensure they are working as intended. This method also helps verify that risks have been mitigated as low as reasonably practicable (ALARP). A recent survey conducted by a leading auditing company revealed a major weakness in this area. Seventy-one percent (71%) of all audit recommendations in 2013 were related to the internal evaluation program, representing a significant increase from the previous years. These results highlight the need for increased focus on continuous improvement efforts.

It is possible that after initial implementation of an SMS, less attention is paid to the area of continuous improvement due to the lack of time and resources. Additionally, if the value of a self-evaluation is not clearly understood, the process gets viewed as just another “check in the SMS box”.

So what are the benefits of an IEP?

- ❖ By questioning, observing and reviewing internal processes, additional deficiencies and undetected operational risks can be discovered and corrected
- ❖ Risks can be mitigated to an acceptable level before an event occurs

- ❖ Sheds light on what is working and what is not
- ❖ Promotes operational efficiencies
- ❖ Involving the entire team in every aspect of the process leads to an improved “safety culture” and understanding of the benefits.

Having an Internal Evaluation Program helps formalize the quality control process and provides additional structure. The IEP outlines methods for continuous safety monitoring by conducting regularly scheduled assessments known as audits. This is achieved through the use of both internal and external elements. The internal audit uses company personnel to perform the assessment, while the external audit is conducted by an outside/third-party entity.



How to conduct an internal audit:

- It is not necessary to audit the entire operation all at once. In fact, it is highly recommended to perform a series of smaller/area specific audits throughout the desired time period (i.e. one year).
- A checklist and/or audit tool should be detailed, and tailored specifically to the organization’s operation.
- The auditor should use various techniques for gathering information, including documentation reviews; personnel interviews; and task observations.
- Details of the audit results, including highlights of compliance and best practices

as well as findings, corrective actions, and follow-up inspections should be documented and used as feedback to improve the system.

- Any findings (*a finding is anything that needs improvement or is not in 100% compliance to standards*) should be assigned to someone within its specific department or area of operation to investigate and mitigate the risk to an acceptable level.
- Audit results should be shared with all company personnel. An audit can be used as a means to safety promotion and education for everyone, not just the department involved.
- Audit results should be periodically reviewed by management to identify trends that may reemerge within the organization. For Example: repeated training issues or poorly documented policies/procedures.

Note: It is also important to conduct audits on contractors who perform operational processes for your company.

Who should conduct the audit?

- Whenever practical, the audit role should be undertaken by persons who are functionally independent of the process being evaluated. For Example: the training department should not be audited by training department personnel.
- In situations where the auditor has no or very little technical knowledge about the area they are auditing, a subject matter expert (within the department) could be appointed as an advisor to help explain procedures.
- It's highly recommended to provide training for team members on how to conduct an audit. Proper training enhances the ability of the auditor and allows for a more effective audit.
- Auditor training does not have to be formal, but it should include a review of the audit tools and procedures; the need to be objective; questions to ask (Why is it done this way? Is it effective?); etc.

How often should the audit be conducted?

- In accordance with ICAO Standards and Recommended Practices, safety audits are to be conducted on a regular and systematic basis.
- Usually the frequency and scope of safety audits is predetermined in the organization's Internal Evaluation Program.
- There could be conditions or events that warrant an audit in spite of a scheduled process.

What to audit:

- Organization and management systems
- Operations Manual

- Training Programs
- Flight and Ground Operations
- Maintenance
- Operational Security
- SMS
- Facilities

Note: The internal audit function also requires the evaluation of the safety management system itself – Safety Policy; Safety Risk Management; Safety Assurance; Safety Promotion.

Sample Internal Audit Tool: Source ICAO SMM
<http://www.icao.int/safety/SafetyManagement/Documents/Forms/Public.aspx>

| SMS ASSESSMENT Checklist - Routine Assessment | | | | | |
|--|--|-----|----|----|--|
| Date: | Auditor: | | | | |
| | Location: | | | | |
| SMS Element | Assessment Question | Yes | No | BP | |
| Management commitment & responsibilities [1.1] | 1 The Safety Policy is relevant to the scope and complexity of the organization's operations. | | | | |
| | 2 There is evidence that the Safety Policy is communicated to all employees with intent that they are made aware of their individual safety obligations. | | | | |
| | 3 There is a periodic review of the Safety Policy by senior management or the Safety Committee. | | | | |
| | 4 The Accountable Manager's terms of reference indicate his overall responsibility for all safety issues. | | | | |
| Safety accountabilities [1.2] | 1 There is a Safety Committee (or equivalent mechanism) that reviews the SMS and its safety performance. | | | | |
| | 2 The Accountable Manager's final authority over all operations conducted under his Organization's Certificate(s) is indicated in his terms of reference. | | | | |
| Appointment of key safety personnel [1.3] | 1 The Manager performing the SMS role have relevant SMS functions included in his terms of reference. | | | | |
| | 2 The Manager responsible for administering the SMS does not hold other responsibilities that may conflict or impair his role as SMS manager. | | | | |
| | 3 The SMS Manager has direct access or reporting to the Accountable Manager concerning the implementation & operation of the SMS. | | | | |
| | 4 The SMS Manager is a senior management position not lower than or subservient to other operational or production positions. | | | | |
| Emergency Response Planning [1.4] | 1 Does the Emergency plan address possible or likely emergency/ crisis scenarios relating to the organization's aviation product or service delivered? | | | | |
| | 2 The ERP do include procedures for the continuing safe production, delivery or support of its aviation products or services during such emergencies or contingencies? | | | | |
| | 3 ERP drills or exercises are carried out according to plan and result of drills carried out are documented. | | | | |
| | 4 The ERP do address relevant integration with external customer or sub-contractor organizations where applicable. | | | | |
| | There is evidence of periodic review of the ERP to ensure its continuing relevance & effectiveness. | | | | |
| Comments: | | | | | |

Definition of Terms:

Safety Assurance – a formal management process with the SMS that systematically provides confidence that an organization's products/services meet or exceed safety requirements.

Evaluation – an independent review of company policies, procedures, and systems. Includes both internal and external audits.

Audit – scheduled-assessments and verifications that verify whether an organization has complied with policy and standards.

This document is a peer reviewed publication by an expert panel of the USHST SMS Working Group. More information about the USHST/IHST, their reports, safety tools, and presentations can be obtained at the web site: www.IHST.org.

Also refer to:
 IHST SMS Toolkit, 2nd Edition for more SMS reference material (pages 39-46):
http://www.ihst.org/Portals/54/2009_SMS_Toolkit_ed2_Final.pdf

FAA Advisory Circular, AC 120-92A, SMS for Aviation Service Providers:
http://www.faa.gov/documentLibrary/media/Advisory_Circular/AC%20120-92A.pdf