Developing Your SMS: One Bite at a Time

By Russ Lawton

Many who attend our Safety 1st workshops on developing a Safety Management System (SMS) tell us that they want to implement an SMS in their company but are perplexed about where to start. It all seems so overwhelming. This brings up the allegorical question: How do you eat an elephant? The answer: One bite at a time. The SMS elephant may seem overwhelming, but dividing the project into 10 bite-size chunks makes it more manageable and helps feeling overwhelmed. Those bite-size chunks for starting an SMS include the following 10 steps.

Step 1
Identify and assign safety responsibilities to managers.

Safety does not "belong" to the safety manager. All company managers must take an active role to ensure the success of the company's safety program. They should therefore be assigned tasks to assist in the company's SMS development and ensure the SMS remains active in their departments. It should not become another document that gathers dust.

Step 2
Identify the person responsible for implementing the SMS.

One person must be responsible for ensuring the SMS gets done. This does not mean one person will do all the work. (Although, if you're the one doing it, you often feel like an army of one.) Every department must participate in the effort.

Step 3
Describe the system.

In other words, document how you intend to manage safety in your company. Describe all your company's activities and how safety risk is evaluated, controlled, and monitored within each activity.

Step 4
Conduct a gap analysis of existing resources compared to SMS requirements.

You probably already have a safety program in place but aren't sure how it measures up against a full SMS. The only way to find out is to conduct a review (gap analysis) of your safety program against the SMS standard outlined in FAA Advisory Circular (AC) 120-92, *Introduction to Safety Management Systems (SMS) for Air Operators*. Don't let the title mislead you; the SMS standard in the AC applies to any organization, regardless of whether you conduct flight operations, maintenance, or FBO operations.

We discussed how to conduct a gap analysis in *Mind the Gap* (ABJ, 2nd Quarter 2007) and provided a sample checklist. The gap analysis is an important tool to mark your progress and provides a sense of accomplishment. Send email to safety1st@nata.aero for a copy of our gap analysis tool.

Step 5
Develop an SMS implementation plan.

Put all your tasks on a timeline and post it for all to see. The plan should be initially based on a 12-month implementation schedule. While this schedule might be too aggressive for some companies, it propels both the momentum and enthusiasm to complete the implementation.

Step 6
Develop documentation relevant to safety policy and objectives.

This step starts at the top in any organization. Top management must clearly document and communicate the company's safety policy to all employees. This should include a commitment to provide resources and ongoing support for the safety management program. The policy should state what the company hopes to achieve by implementing an SMS.

Step 7

Develop and establish a means for safety communication.

Get the safety message out to all employees on a regular basis via newsletter, Internet, etc. You must also establish a non-punitive safety-reporting program that allows everyone to communicate hazards and near misses that could result in incidents or accidents.

Step 8

Communicate the SMS implementation to all employees.

Ensure that everyone understands what the SMS program is all about and what their role will be as it's implemented.

Step 9

Develop an initial training plan for all employees.

Everyone must be trained on how the SMS works and what their expected role will be within the SMS.

Step 10

SMS implementation plan.

The person responsible for implementing the SMS assigns tasks within the company and monitors and communicates progress to everyone. A gap analysis should be conducted periodically (at least every six months) to document progress and give everyone a sense of accomplishment.

Completion

When you've completed the initial development of your SMS, you should have the following documentation completed:
- Management commitment letter,
- Management responsibilities defined,
- Safety policy and objectives,
- Safety responsibilities for managers defined,
- Results of gap analysis of your operational systems,
- SMS implementation plan for the entire organization,
- A letter or equivalent advising all employees of the SMS implementation, and
- SMS training plan for all employees.

Congratulations on completing the initial development. You're ready to move on to the next phase, which we'll discuss in the next issue. Until then, we've provided you a roadmap to get started—now go do it!