Driving Your SMS Beyond Compliance to Performance

Keven Baines, Managing Director of Baines Simmons, discusses how organisations can tackle the challenge from transitioning from compliance-led SMS that is viewed as a costly regulatory burden to a performing one that delivers tangible benefits.

Introduction

At Baines Simmons, a common grievance we come across from prospective clients is, “we have spent the last two years developing our Safety Management System, and we don’t get hazards reported any more than we ever did. We still remain largely occurrence led. How do we get a proactive picture of safety?”

Our response to this is that we believe that safety management has to be an integrated and people-centric undertaking because people do safety – policy and procedures do not. Only then will it offer organisations a true picture of their safety performance which, ultimately, leads to the systematic risk reduction and business improvement that an effective Safety Management System is capable of delivering.

Most Safety Management Systems in existence today, however, focus on systems and process and not the people. Safety performance, on the other hand, is about the people. It is about generating positive safety cultures and organisation-wide engagement. In other words, it is the people and their behaviour that comprise a safety culture that is the key to unlocking the benefits from a sustainable world class SMS.

Experience and research conducted by Baines Simmons has highlighted that the vast majority of aviation organisations are struggling with the softer, less traditionally ‘compliance focused’ elements of safety leadership and safety culture necessary for effective safety management. They are taking a historically regulatory compliance approach to address the problem and rely on regulators to generate the necessary buy-in at the top of their organisational management.

However, neither regulators nor internal company Compliance Management, Quality Assurance or Safety personnel have traditionally been required to develop skills in business management or organisational performance and they have had their own challenges in responding to the needs of this emerging world of performance-led Safety Management Systems. So, whilst organisations can and are delivering compliant Safety Management Systems, the aviation industry is facing an ever-widening gap between these compliant systems and those which deliver true safety performance. So is there a way that industry can tackle this gap? We suggest that there is.

Answering the Integration Challenge

At the core of an effective SMS is integration. This is clearly laid out in the model of SMS set out in ICAO Doc. 9859. The challenge to achieving this is managing the interrelationships between people, groups and departments within organisations, balancing their needs and reducing conflict from internal ‘politics’.

Baines Simmons’ view is that an integrated SMS:

- threads the doing of safety into existing organisational business process
- involves the central integration of departmental safety cultures
- is the integration of departments/divisions (Flight Ops, Maintenance, CAMO, Ground Ops etc) into one common safety management programme
Driving Your SMS Beyond Compliance to Performance

- brings it all together through a coherent understanding of your safety model
- is an investment with the potential for high returns over the long-term.

Integration means both horizontal and vertical lines working systematically together towards the same goals. Horizontal integration (between departments) requires both a common picture of the challenge and a common model of the solution shared among everyone in the organisation. Vertical integration, in contrast, is about the joining up of the existing safety management elements into one cohesive system.

Figure 1 here is Baines Simmons’ model of the different elements of safety management that, when integrated effectively, offer the performing SMS sought by aviation organisations.

For many, the softer aspects of SMS are much more nebulous. In the Baines Simmons model of safety management, we suggest that the ‘people’ element needs to be addressed from both top-down and bottom-up. Represented by the dark blue boxes in Fig. 1, we contend that safety leadership needs to be present and active in a performing SMS. However, this must be accompanied by development and sustenance of a positive safety culture that is adopted by the whole organisation if an SMS is to have a chance at succeeding.

Achieving Active Leadership

In late 2010 Baines Simmons conducted an online safety management survey that attracted responses from 252 organisations. 92% of these respondent organisations were actively involved with developing a SMS. Of those respondents, the most commonly reported reason for difficulty in moving SMS forwards was management buy-in. This conclusion was further strengthened by the fact that only 5% of these organisations were doing so to improve business performance, and 4% to keep their senior management team happy. (See Fig. 2)

A formal Safety Management System must be desired by all levels of the organisational management team, not simply by those tasked with managing compliance. Establishing a performance imperative that SMS is good for business, will help to convince the executive team that there is added value, over and above compliance.
For many organisations, taking a business performance approach to aviation safety involves transferring ownership of safety away from the current safety department so that an organisation-wide safety cultural engagement can be secured. For many, this becomes a major obstacle. In particular, this is the challenge facing many mature airline organisations where safety has been traditionally ‘owned’ by the Head of Flight Operations, and has been almost entirely flight-centric in focus.

To overcome this, it is essential for the executive team to be directly involved in developing what ‘good’ will look like for the organisation. By envisaging what benefits a systems approach to safety management will deliver, buy-in to a strategic approach to its development is both more likely and will free an organisation from the interdepartmental wrangling for power and status.

In our experience, the most effective approach to achieve active leadership is for an organisation to conduct a ‘Point A’ (‘Where are you now?’) safety analysis from which can follow ‘Point B’ (‘Where do you want to reach?’) safety strategy workshops with senior executives. Plotting the A to B journey allows organisations to define and share a safety vision and develop a common consensus of the strategy, giving an opportunity for the executive team to understand that safety can be good for business rather than just a costly regulatory burden. This shared vision and strategy can then be translated into a development roadmap with clear milestones and accountabilities that the whole organisation can commit to. (see Fig. 3).

As a means of securing executive team buy-in, this plotting of A to B approach has proven to be most effective, with 100% of our clients who choose to partner with Baines Simmons in this way having a demonstrably high level of management team buy-in.

**Cultivating a Positive Safety Culture**

There is general acknowledgement in the industry that aviation systems do not perform as per design specification most of the time. How people inside an organisation react to these unmet needs, norms, the pressure to deviate, and what they consider acceptable risk taking is essentially what the management of safety is about; it is what we refer to as a safety culture.

In May 2010, Baines Simmons invited airlines, original equipment manufacturers, and maintenance, repair and overhaul organisations to participate in a safety culture survey. The majority of the 330 people that responded were either managers or senior managers in their respective organisations. They were asked to answer the questions in the way that they thought their front-line employees would answer them. These responses were then contrasted with the survey results conducted with approximately 2000 frontline technicians that had answered these same questions in an earlier survey. Of concern were the similarities in many of the responses:

- 52% of managers responding believed that their front-line workforce engage in non-compliant behaviour
- 16% knowingly condoned non-compliant behaviour within their front-line workforce
- 16% intentionally pressured their employees not to follow procedures

---

• 10% condoned employees not following procedures

The results of these surveys suggest that the message is fairly clear to the technicians that production is more important than safety. The survey results also clearly indicated that the concept of “mutually facilitated risk” is at work in both the technician and the management teams. If management is aware of the non-compliance issues and at-risk behaviours taking place in their organisation and they are not proactively addressing these issues, then they are equally culpable.

Yet, in the same managers’ survey, when asked whether they agreed or disagreed with the statement, “Management investigate incidents to understand weakness in safety procedures, not to discipline the person”, 42% of the managers disagreed. This is an indication that managers absolve themselves of any culpability and instead participate in the Blame and Punishment management model (in other words, supporting an anti-Just Culture).

“Mutually facilitated risk”, or the tacit complicity or understanding the safety is subservient to other priorities, represents a non-safety culture. The safety culture of any organisation is a direct reflection of its value system. Is safety really the principal business value or is it in fact just a slogan at the front of the building, or on the office or crew-room wall?

For safety management to deliver we must engage both management and front-line staff. There is, in effect, a symbiotic relationship between the commonly held view of the key elements of safety culture as represented in Fig.4 and those of the people working (and so behaving) within it. The people within the system and their behaviour are what fuels and sustains a safety culture and a safety culture can only exist within an organisation where each individual, regardless of their position, assumes an active role in safety management to a model agreed by the organisation.

Consequently, a strong, positive safety culture then is one that focuses on getting the right behaviours being demonstrated in the right place, at the right time.

Managing Human Performance – enhancing the relationship between safety culture and people

Building a highly effective management of behavioural risk through the articulation of what safe behaviours are is therefore a must for any organisation seeking to develop a world-class safety culture. What this suggests is that our industry should turn its attention next to safety competence development or Human Performance Management (HPM) for safety.

Human Performance Management (HPM) has been largely overlooked in the ICAO 9859 centric approach to safety management. ICAO 9859 introduces the subject of ‘Practical Drift’ and reiterates later the importance of Human Factors (HF) management to effective SMS, but fails to offer an explanation or a way forwards regarding the integration of these vital safety management elements.

The difference between the traditional notion of Human Factors and HPM is that the latter focuses on the effective embedding and cultural sustainment of HF principles into the everyday operation. Human Factors training has delivered knowledge. The study and application of HPM, however, will deliver organisational competence in
terms of daily safety behaviour, targeted socio/technical intervention and organisational waste and risk reduction. In other words, it is about the transition from getting it to doing it, and the practical development of a safety culture. As already discussed, our managers and leaders can be an inhibitor to effective safety management. From a regulatory perspective, there are clear requirements that focus on the managers’ technical competence; none however concentrate on the necessary competence for anyone who leads a team and needs to support a safe organisational culture.

HPM represents the next logical step in ongoing people engagement in safety. HPM is a proactive approach focused on constantly breaking down inhibitors and obstacles to safety performance.

By facilitating, shaping and reinforcing the behaviours you want to see exhibited in your organisation, the separate elements of a safety culture become significantly easier to develop and sustain.

From Baines Simmons’ perspective, we are seeing Human Performance Management initiatives rapidly being adopted by proactive organisations looking for real safety and business return on investment. One of our client organisations, a small avionics overhaul EASA Part 145 Approved Maintenance organisation, had been plagued with finding line replaceable units ‘dead on arrival’ at the customers’ aircraft. These accounted for 80% of the organisation’s output failures. A structured investigation, using trained event investigators, identified that an open plan workshop had led to an increase in distractions during the return to service. The subsequent warranty claims and disruption costs alone amounted to £45,000 in one year, in addition to the associated reputational harm. The organisation subsequently invested £850 on the investigation and resulting human performance intervention. The results were telling: resulting in a reduction of ‘dead on arrival’ components by 76% and savings of £34,200 in just year one.

Conclusion

Developing a people-centric positive cultural capability is key to unlocking the benefits promised by an effective safety management system. Without proactive and systematic data upon which to conduct the risk assessment, the SMS will remain a costly regulatory burden. For far too many, safety is still seen as something that is done by someone else and not something that helps to deliver the services the organisation was set up to do in the most efficient and business beneficial way.

Whilst buy-in issues remain the significant challenge for most organisations, a systems approach to safety management necessitates a ‘sales’ or return on investment approach. The case needs to be made to everyone that SMS can be and is ‘good for business’. Buy-in is necessary from people throughout the whole organisation. These are the same people who are often initiative fatigued, who have had QMS, TQM, Six-Sigma, HF, CRM and more applied to them, and so the challenge to involve them is all the greater.

It is now time that Safety Management System development efforts need move away from systems and processes, towards the two more challenging, but vital elements; that of developing active safety leadership and developing positive safety cultures.

So how does an organisation power safety performance through positive safety culture? It begins by securing executive team buy-in. Without this, SMS will be a ‘pushed’ (into the organisation) activity by virtue of regulation, rather than a ‘pulled’ (into the organisation) activity (by virtue of the top team wanting SMS because it is good for business). This challenge requires careful thought and a detailed, planned approach because it represents a once in a lifetime golden opportunity. Understanding the added value to business performance that safety management can bring switches on a safety culture which engages middle management and first line supervisors in the ‘doing’ of safety. Safety behavioural standards supported by active safety leadership and a Just Culture
philosophy can result in an improved risk management capability through richer reporting. Locally owned effective investigations will further reward the organisation with a culture that is proactively and systematically able to prioritise safety, reduce costs and improve operating efficiencies. It will deliver the ultimate goal of any SMS: risk reduction and business improvement. SMS has to be a people-centric undertaking, because people do safety; policy and procedures do not.

References

ICAO Doc. 9859, Safety Management Manual (SMM)
Second Edition (Quebec, Canada: ICAO, 2009)