



Introduction of SMS into Part CAMO

Practical steps

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About me



- **Aviation Safety Manager, TUI Airways**
- Safety Manager, Flybe
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- PhD, Human Factors in Air Accident Investigation, Cranfield University
- MSc, Human Factors and Safety Assessment in Aeronautics, Cranfield University
- Mechatronics engineering degree, ENSIAME France



Why SMS (in Part CAMO) is important

- **Continuously enhancing Safety – we're able to be proactive and predictive**

- Improved Operational Safety
- Reduced inefficiencies
- Cost reduction
- Reputational impact

- **Safety becomes a way of working**

- An SMS will not be effective unless there is a positive safety culture, which in turn determines how your people will contribute to the SMS and what they think about it.
- Safety culture is the oil that lubricates the engine parts (elements of the SMS)
- Safety culture is the link between behaviour (errors and violations) and the effectiveness of the SMS
- Improvement in safety attitude and better understanding of responsibilities
- Better Safety Culture = Improved Just, Reporting, Learning, Informed and Flexible Cultures



The CAMO, the AOC, and the ATO using the same SMS

PROS

- Bridging the gap between the CAMO and the Airline
- Reducing the siloes
- Speaking the same 'risk management' language
- Visibility of risks and hazards – cumulative risks
- Even greater efficiencies – more coordinated approach, shared processes and resources
- Learning from each other and with one another
- Increasing influence
- Taking one step further towards a fully integrated management system

CONS



A transition of regulation has risks associated to it – these need to be identified and managed using SMS processes (e.g. MOC)

STEP 1: Where are we at?

- Defining what good looks like – using the regulation, industry best practices and company ambitions
- How far are we from it? Using known SMS assessment tools (Gap Analysis, Phase 1 etc), and the compliance and safety teams
 - Realistic Assessment of our SMS across ALL areas – what's effective and what's missing or needs consolidating?
 - In-depth assessment within the CAMO:
 - ✓ Are some processes already in place AND effective?
 - ✓ What did we think was in place but isn't?
 - ✓ What is the SMS understanding across the CAMO?
 - ✓ Is there anything that the CAMO has in place that the SMS could benefit from?
 - Identify what can be aligned and what cannot be aligned – which processes are adequate for the CAMO and which ones will need to be adapted?



And no, it's not a race!



STEP 2: What's the priority? Informing and convincing our people

- It starts with Senior Management - but sometimes they are not the most challenging to convince
- Informing the team about the change using key safety forums, internal communications, 1:1, external training:
 - What the change is
 - Why it is important (beyond the fact that the regulator requests it)
 - What is expected of them
 - How it impacts them (e.g. responsibilities and decision making)
- Conducting a safety survey to obtain a wider understanding of the current knowledge and behaviour and in turn assist in developing adapted training
- Providing feedback from the assessments and on the survey – what we are already doing 'right' and what we are aiming at
- Behaviours and culture do not change over night



STEP 3: Planning

- Effective planning will ensure nothing gets missed
- Cross referencing using SRG1770, our manual and the building blocks of the SMS to plan the review (where required) and implementation of the key processes:
 - Policy and objectives
 - Safety Risk Management
 - Safety Assurance
 - Safety promotion
- Making key decisions and liaising with the regulator – e.g. SMM vs CAME, Reporting lines



STEP 4: Develop/adapt the processes and train the teams – Increase awareness

- We are not doing it in isolation – the SMS needs to be the right fit for the organisation
- We are engaging with the CAMO teams (at all levels) to ensure the processes are usable and effective
 - Feeling of ownership (e.g. objectives development, procedure writing)
- Training at the right level – who needs to know what
- Highlighting safety responsibilities vs responsibilities of the safety team
- No assumption should be made – some things will be new and others won't be understood immediately
- Safety Manager is included in key meetings and continuously encourages risk-based thinking



STEPs 5 – 6 – 7...

- It doesn't stop once we obtain the approval
- CAMO are now 'formally' part of the SMS team – i.e. they need to be treated the same way, they need to be included
- Continuous improvement should also consider CAMO



Potential Challenges

1. "We've always done it this way" - "We're already following the SMS" - "We're compliant"
2. "Why now, we've got plenty of time"
3. One size fits all: It's not all about Part CAMO adopting the SMS policies, processes and procedures – the SMS has to be right for the CAMO, it has to adapt
4. There are elements of CAMO.A that are not in ORO.GEN (e.g. HF in Safety Policy)
5. The SMS may be more advanced in other areas of the business
6. There is limited industry best practices (e.g. Safety Performance Measures for the CAMO)
7. Reporting lines and responsibilities
8. Cultural differences – e.g. reporting culture
9. Siloes – engineers vs pilots
10. Remote working



Conclusions

- There are benefits and risks associated with the introduction of SMS in part CAMO.
- The initial assessment may be a shock.
- But this is an opportunity – let's embrace it.
- You need senior management to believe in it!
- It takes time.
- We're all on the same team.
- It will all eventually come together.



Thank You

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