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REVIEW

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Management of Change….. Taking a Closer Look

Validating your organisation's efforts to assure safety and operational integrity is a key element of maintaining a safe operation writes **Louis Sorrentino** and **Mike Smith** from Aviation & Marine Safety Solutions International.

The identification and management of hazards affecting the integrity of your operation is a fundamental objective of all flight departments or organisations working within a risk based environment. Within aviation, more and more operators are coming to the conclusion, and rightly so, that mere regulatory compliance is not an assurance for operational integrity and safety. The regulations are the lowest common denominator to assure regulatory compliance to standards designed to provide a foundation for operational stability and attention to some of the most basic, fundamental risks within aviation. While regulatory standards do portend to address some risk within aviation, there are too many moving parts, to many variables, too many behaviors too warrant a one-size–fits-all solution for managing risk and assuring safety. Additionally, enhancements to regulations often move slowly as the dynamic environment of aviation uncovers systemic weaknesses as a result of accident investigation and exhaustive root cause analysis.

Emerging technologies present a special challenge for regulators as businesses keen to embrace the operational and economic benefit that new technologies promise are constantly pushing the regulatory envelope with their introduction. Regulators face the impact of acquiring the understanding of new technologies, developing the resources to contemplate regulatory needs and then the often lengthy rule change mechanisms that aviation authorities are bound by. The regulator is thus not well positioned to be the sole source of safety assurance with the introduction of new technologies.

Change is needed and must be accepted by all.

Managing risk and identifying hazards is more than just regulatory compliance.

Yes, most operators have the basics down, addressing the obvious risks, but fall short on those risks that are contributory to the overall performance of the flight department. The regulations provide a prescriptive regulatory standard and most operators will easily demonstrate compliance. Like checklists, which we expect every pilot or mechanic to follow, organisational and individual cultures and behaviors may alter commonly held expectation. And many of the most basic occupational safety and health requirements are ignored due to a lack of attention by the regulator "until' there is a problem or event requiring their attention.

So, some basic questions:

- When was the last time your organisation performed an independent operational assessment (not audit) of your flight department?
- When was the last time an independent evaluation was conducted of your pilots and flight crew, mechanics and ground staff, observing what they do every day, on their home turf?
- For those that have a Safety Management System (SMS), when was the last time your SMS was evaluated by an independent external third party?
- Do you have a management of change programme or process?
- When was the last time you performed an actual occupational safety and health assessment of your workplace and work environment (yes, en route and away from base) to validate not only regulatory compliance but also to address present but unreported hazards and risks and emerging potential risks?

I would venture to say, based on experience, that most corporate business and charter organisations within the region "believe" their programmes address these questions, but few can provide the 'independent' assessment to validate their perceptions.

One of the contributing factors to this lack of *situational awareness* is our industry's over-reliance on the seemingly obvious partitions within various regulatory frameworks that govern aviation. The

typical organisation addresses this by having the flight department focus mainly on the regulations affecting flight operations, while either Facilities, Human Resources (HR) or a true EH&S department or outside party focuses on ground hazards and risk or Occupational safety & health (and environment).

More times than not, many of these internal evaluations are, once again, based on the prescriptive requirements, and not at the actual dynamic environment and behaviours that is aviation. Many organisations merely follow the same checklist time and time again, building in complacency, rather than building checklists on historical experience and emerging trends. And this is all because of a deficiency in awareness to the dynamic environment of aviation – we are very good at being reactive, and even proactive when we see something happening to someone else. But what about predictive?

What is needed is a holistic approach to managing operational safety and integrity. From the organisation's stated and practiced goals and objectives; to regulatory compliance; to assessing known and

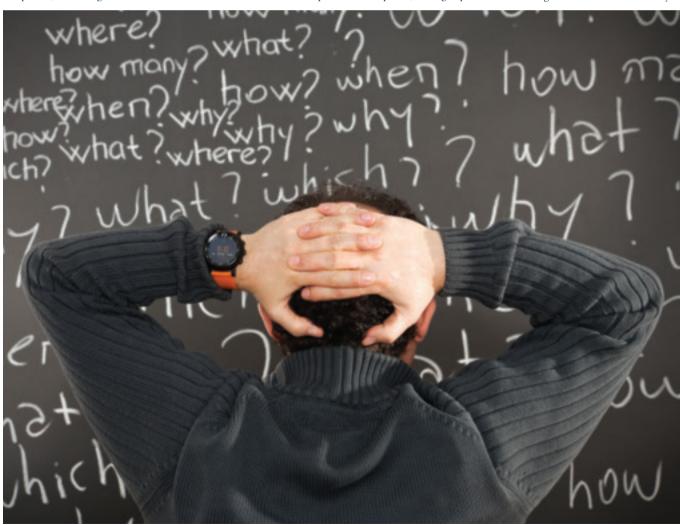Independent audits can help answer the questions and can identify potential weaknesses.

potential hazards and resultant risk within the expanse of organisational operations; merely relying on the prescriptive standards is not enough.

Many corporate or charter operators don't see the obvious value of having a third party or external standards (IS-BAO for example) audit performed on a routine basis. Why? Well, that is a good question. Why wouldn't you want to know if standards and policies are not being followed, or if conditions within the workplace present hazards and risks that are not typical to the generalist inspection? Experience has shown that that these **independent** external audits and reviews identify potential weaknesses or, put more simplistically, opportunities to enhance operational safety and performance. Look, believing in the quality of your flight department and support services is a good thing, but relying on that 'belief' without objective evidence, can be a mistake with consequences.

On a recent SMS development exercise for a large operator, we were able to encourage the organisation to perform a comprehensive risk profile, looking at past

and potential accidents, incidents, injuries, near misses and conditions that would impact the operator's business. Once the data was collected and analyzed, it became apparent that the operator was missing a large number of contributing factors and conditions that impact on its overall performance, from inconsistent corporate guidance, to incomplete SOPs, to an over-reliance on "this is the way we have done it for years". The organisation was provided with the much needed insight into why it performs the way it does, and a roadmap to change the way it communicates, encourages feedback and insight, and demonstrates regulatory compliance.

Routinely performing independent assessments, evaluations, diagnostics and even performance-based audits will help raise the level of organisational awareness and attention to the details. This raising of awareness, if done properly, will enable the organisation to communicate what is important, going beyond the regulations, so that every employee understands the shortcuts and not following SOPs are not welcomed, and reporting of incidents and potential incidents or near misses, should be encouraged so we can learn and analyze

Business aviation companies can take the extra step to embrace harmonised standards by voluntee-ring for the ISBAO accreditation.

what impact these conditions may have on our operation's ability to perform and perform safely.

Communication is the essence of the safety management system and something every operator should hold as a fundamental objective in its day-to-day operation. A universal characteristic of highly safe organisations is a reporting culture that extends to open discussion and dialogue across all levels of the enterprise. Even these organisations can benefit by involving a third party who will often elicit some very candid opinions from within the organisation that otherwise are not expressed.

A compelling reason for engaging external help in introducing a change to your organisation is our people. By its nature aviation attracts people who are naturally risk-averse and in this context, change-averse. This is a good thing! We want pilots, mechanics, dispatchers and air traffic controllers who are risk-averse and who like to follow SOPs, to use checklists and to perform their duties in a predictably consistent fashion. These same people are the ones from who we draw our management teams, our directors of operations, directors of maintenance and our safety managers, all of whom will be expected to make significant contributions whenever a change is contemplated.

The key to effective implementation is engagement and communication. Many people in the organisation will want the benefits of the change, but will need to be given a high level of confidence or reassurance that the benefits will outweigh the costs. This is why communication is such a fundamental component of an organisation's Safety Management System and to inform that communication, hazard identification and the development of a risk profile are important elements.

Change management requires a unique set of skills is that are unlikely to be the strong

points of an aviation business's manage-ment team. Even in an organisation with a mature Safety Management System, it is probable that the development of a safety risk profile for any specific change will be biased by the paradigm within which the organisation's people operate. The concern here is that some risks are given an undeserved high score while others are all but ignored and this leads to an inefficient and perhaps even an unsafe allocation of mitigation strategies and resources.

From these observations there arise two logical points in the change management process that an external evaluation can provide added value.

Firstly, when developing the risk profile for a specific change, such as, for example, a new aircraft type, new airport, new approach, new ground support equipment (GSE), or amended process for evaluating a new external vendor, a third party can provide a fresh perspective on that change and its attendant risks and can validate the assumptions that drive the risk assessment process.

Secondly, and equally importantly, when conducting a post-implementation review of the specific change or new process, an outside view of the change can help uncover any unintended consequences that might otherwise go un-noticed by those close to the implementation process.

When deciding to engage a third party to perform an external evaluation of your change management plans, it's important to consider the experience of that third party with change. Many auditors in our industry carry the same risk aversion instincts with them from their operational experience. For an auditor, this might seem a highly desirable characteristic but it might not provide the best value when an evaluation of change is the subject. Look for an external evaluator that has change management expertise but also has the credibility that extensive operational

experience brings. Choose an organisation that has a robust operational evaluation methodology that can provide a holistic approach to examining your change.

For example, AvMaSSI applies a Safety Architecture approach to operational excellence that provides our subject matter experts and seasoned auditors the latitude to explore the systems and components that comprise the liveware and hardware that supports the technical areas within that system. In this way, the evaluators are not encumbered by checklists and prescriptive standards.

Many of the world's air carriers and operators opt to go the extra step by embracing harmonized standards such as IATA's Operational Safety Audit (IOSA) and suite of programmes, and IBAC's International Standard – Business Aircraft Operations (IS-BAO) audit programme as they move beyond mere regulation and incorporate harmonised standards and best practices. These programmes, and others, are usually years ahead of a regulator's ability to engage and complete the rulemaking process while working with industry to educate and encourage implementation.

And as a sign of the changing times, several forward-thinking air carriers (mainly in the Middle East Region) are moving forward by requesting independent open architecture assessments, or as we call them, Operational Diagnostics, to assess the organisations true compliance to regulation, conformance to company programmes and the effectiveness of its change management programmes. The results have intrigued Boards of Directors and CEOs wanting to know the true operational health of their company.

Its basic risk management and it's as simple as **taking a closer look.**

Lou Sorrentino is the CEO and Managing Director of Aviation & Marine Safety Solutions International, (AvMaSSI) an international safety, quality and operational excellence consultancy performing services worldwide to the aviation and marine industries with offices in Palm Beach, London, Auckland and Sacramento. Sorrentino is a regular speaker at MEBA conferences and other events.