Do You Think You're Ready? An Inside Look at Gaining the Most Benefit From an Audit

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After a recent independent operational safety audit conducted on a high-profile flight department, the director of aviation commented that he and his team learned more about their "books" and contents (policy, procedures, and processes) than previously anticipated via the traditional audit process. He also stated that they saw, for the first time, how each element linked to the others, and addressed regulatory or industry standards, and voluntary best practices. In general, the organization extolled the benefits of our audit process, which dissects both the literal and presumed intent of the wording, and assesses how this is trained, perceived, and then practiced within the flight department.

On many occasions, the operator assumed the language contained in the manuals was satisfactory and met the scrutiny of the regulator. He also assumed the same language met the intent of the recognized voluntary standards, such as IS-BAO or IS-BAH.

The audit process revealed that both of those assumptions were not entirely accurate. However, the audit was viewed as a success because it highlighted to management areas of conformance, and in some instances non-conformance, to company and voluntary standards. It further provided the operational management team with an in-depth review of the intent of the standards and how their language and manuals either hit or missed the mark. This provided insight that enabled their team to craft language to meet the intent of the standards in their own way, rather than copying the standard verbatim and merely placing that verbiage in their manuals.

Compliance Starts with Familiarity
Understanding the intent of keywords, phrases, and how the intent is embroidered within the manuals and training is the sum of the game. So, how to get there?

This may come as a shock, but most operators fall short of thoroughly understanding the intent of content - what's in their manuals and training programs. When they read their manuals, they "see" what they expect to see and not necessarily what is actually written. They miss many

keywords and phrases, and assume they meet the standard because it's plainly written. Wrong!

Within the standards are words and phrases that go beyond linear interpretation. For example, the phrase: "the Operator shall ensure..." contains two keywords requiring demonstrable action. The first word, "shall," implies that the operator has made this a requirement, a mandate of the company, and there is no option. The second word, "ensure," signifies that the operator will define the policies, procedures, and processes that guide a task or process through to completion. If it does not conduct the process internally, the operator must address the complete process of oversight to ensure it is being accomplished per the manual.

Readability and Accuracy are Essential
While understanding that keywords and phrases are significant components of effective manual development, other elements such as numbering systems, use of headings, font size, and alignment all add to the readability and legibility of the manual, often referred to as Human Factors (HF) considerations. Beyond readability, there is the need for the content to accurately reflect what the organization actually performs.

This is best accomplished via a two-step process. The first is sitting down and actually reading the manuals, Standard Operating Procedures (SOPs), and the respective guidance documents page by page. Yes, spending quality time in the books, ensuring the words match the real world, is crucial.

The second step is gathering with other operational functional managers to discuss the content, ask questions, and validate the processes by looking to the operation and asking, "Are we really doing this?"

One other common weakness is the repetition of phraseology and/or processes in multiple manuals. The risk is that with multiple manual owners, revision processes mean data and phraseology will change in one manual and immediately be out of sync with others, creating an opportunity for an operational lapse or error. Unless required by your regulator, make every effort to write a policy, process, or procedure once only and have pointers to it within other manuals.

The Value of Regular Reviews
The manual revision process should become a routine, shared duty within the company. Each department should be tasked to engage with the manuals, processes, and users to provide insight, updates, and corrections as necessary, and that task should be documented. For SOPs, these are best addressed by requiring individuals to validate the SOP against actual tasks.

By doing this, the company can easily determine where processes and procedures are correctly performed or where actual performance has "drifted" from the written SOP. The worst-case scenario is where employees intentionally violate SOPs, sometimes unwittingly based on ineffective training, lack of supporting guidance, complacency, and/or inadequate supervision. These are topics for another article but are all weighted the same, and can each influence the outcome of operations 24/7, 365 days a year.

Some operators go so far as to ensure they are always "audit ready," embedding processes for a continuous review of manuals against regulatory, company, and voluntary best practices and standards. The concept of "audit readiness" is based on the confidence of the operator in their resources, systems, processes, and oversight rigor to ensure continuous compliance and conformance.

This essentially says, "We can be audited at any time, because we are always ready," and eliminates the stress and distraction of audit preparation. If you are always paying attention to the manuals, guidance documents, and SOPs, and any changes thereto, you are then, theoretically, always in compliance with regulations and conformance to company standards and voluntary standards.

When we audit an operator, we are impressed more by the operator who knows their documentation and takes control of the audit process, rather than the one who filled out the checklists with generic, high-level references that don't address the essence of the question or standard.

Your Path to Conformance
Those new to the audit process or who have yet to experience a high-quality audit can use the audit process as a roadmap to conformance to the standard. Ensure the manual references are accurate and on point, not high-level, general references. Want to learn more? Feel free to reach out and we'll be happy to walk you through a proper audit process.

In summary, make the most of your audit experience and include as much of your team as possible so awareness can be raised at one time. If you know your books and are confident in their accuracy and adherence to the standards, you'll be ready!

Aviation & Marine Safety Solutions International

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