Just Another Look... The Argument for Independent Assessments and Audits

By: Louis A. Sorrentino III
CEO & Managing Director, Aviation & Marine Safety Solutions International

Validating your organization’s efforts to assure safety and operational integrity.

The identification and management of hazards affecting the integrity of your operation is a fundamental objective of flight departments or organizations working in a risk-based environment. Within aviation, more and more operators are coming to the conclusion that regulatory compliance is not necessarily the end all and be all to assuring operational integrity and safety. Regulations are the lowest common denominator in assuring regulatory compliance to standards designed to provide a foundation for operational stability and attention to fundamental risks within aviation. While aviation regulatory standards do portend to address some risk, there are too many moving parts and variables to warrant a one-size-fits-all solution to managing risk and assuring safety.

Most operators cover the basics by addressing obvious risks, but fall short on risks that contribute to the overall performance of a flight department. Regulations provide a prescriptive regulatory standard, and most operators will easily demonstrate compliance. Like checklists, which we expect every pilot or mechanic to follow, organizational and individual cultures and behaviors may alter commonly held expectations. 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.

Some basic questions:

- When was the last time your organization performed an independent operational assessment (not audit) of your flight department?
- When was the last time an independent evaluation was conducted of your pilots, flight crew, mechanics and ground staff, observing what they do every day on their home turf?
- When was the last time you performed an actual occupational safety and health assessment of your workplace and work environment (en route and away from base) to validate not only regulatory compliance, but to also address present but unreported
hazards, risks and emerging potential risks?

I would venture to say that within the 14 CFR Part 91 world, this is a rarity.

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 organization addresses this by focusing the flight department mainly on the FARs, while either HR, Facilities or a true EH&S department or outside party focuses on OSH, or occupational safety and health (and environment) oversight.

Once again, many of these internal evaluations are often based on the prescriptive requirements, and not on the actual dynamic environment and behaviors found in aviation.

What is needed is a holistic approach to managing operational safety and integrity. From the organization's stated and practiced goals and objectives, to regulatory compliance, to assessing known and potential hazards and resultant risks within the expanse of organizational operations, merely relying on the prescriptive standards is not enough.

Many Part 91 operators don’t see the value in implementing a third party or external standards (IS-BAO for example) audit performed on a routine basis. Why? 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 OSH inspection?

Experience has shown that these independent external audits and reviews identify potential weaknesses or opportunities to enhance operational safety and performance. 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 organization 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 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 organization was provided the much-needed insight into why it performs the way it does. They were given a roadmap to change the way they communicate, encourage feedback and insight, and demonstrate regulatory compliance.

Routinely performing independent assessments, evaluations, diagnostics and even
performance-based audits will help raise the level of organizational awareness and attention to
details. This raising of awareness, if done properly, will enable the organization to communicate
what is important beyond the regulations. Every employee will understand that shortcuts and
not following SOPs are unwelcome. Reporting incidents, potential incidents or near misses will
help the organization learn and analyze the impact these conditions may have on their
operation’s ability to 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.

Global Aerospace encourages all of its clients to go the extra step and validate its programs and
practices that affect the day-to-day performance of the flight department. Basic risk
management is as simple as taking just another look.

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