

COMMON ISSUES IN SMS REVIEW AND VALIDATION

1. Does the SMS cover the entire organization?
2. Are all Certificate Holder processes accounted for? (Suggest a detailed review of the Organizational Chart in concert with the Gap Tool development process).
3. What responsibilities are given to operational/line managers (e.g. flight ops, maintenance, ground services, etc.)? The system should be 'Process Owner' driven rather than focused on the safety officer/safety department. Look for directions regarding involvement of management including top management (e.g. CEO, COO, SVPs, Division Managing Directors, etc.) in:
 - Policy – 5.21
 - Safety risk management - 5.51; 5.55
 - Safety assurance (particularly management reviews – 5.25; 5.71; 5.73; 5.75).
4. Are the safety risk management and safety assurance functions focused on the safety office/safety department or are they driven by Process Owners of line organizations (managers who can allocate resources and direct employees' activities)?
5. Are there a good set of checks and balances between line management and oversight activities of the safety officer/safety department (e.g. auditing and evaluation by both line managers/organizations and the safety officer/organization, access to and accountability of top management)?
6. Does the SRM process look at all levels of risk? SRM should be included anytime one of the four 'triggers' in 5.51 surface during:
 - Strategic decision making and system/process design,
 - Change management,
 - Operational control/supervision,
 - Line operations (crew/team/individual employee activities).
7. Are there clear, practical instructions on how to use and interpret risk assessment tools such as risk matrices?
8. Does the reporting system allow for reporting potential hazards in operations or in the workplace as well as reporting events?
9. Is there a path from data collection to analysis, to assessment, to control or problem resolution? (Data must be used to have value in decision making. This is fundamental to the concept of Risk Based Decision Making (RBDM) in a "system.")
10. Do the analysis functions look across reports and data sources to identify patterns and trends or is the system limited to looking at each event, report, or finding independently?
11. Is there a method of tracking hazards and problems in and between SRM and SA processes as well as tracking progress on resolution (e.g. hazard database, action log)?
12. Is hazard status, progress toward mitigation and resolution of problems reviewed periodically? (Must be part of the process defined in 5.25 & 5.73; and not something "pushed uphill" by the safety officer/safety organization).