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# Seattle-Tacoma International Airport Safety Policy Guide

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**Prepared For:** Federal Aviation Administration  
Office of Airports  
Airport Safety and Operations Division

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Revision History

Date	Version	Summary
11-18-09	v.0.1	Initial draft for SEA review
11-20-09	v.0.2	Revised internal review
11/27/09	v.1.0	Final

**Prepared in Support of Statement of Work Section A – Safety Policy, Task 1**

***Task 1. Develop standard elements for an SMS Policy.***

*With the large variety of recommended policy statements available internationally, the approach will be to develop a policy template with a yes/no decision tree for each airport to use. This policy template will provide guidance on what is appropriate for an airport of similar size and operation. To complete this task, the airport will develop a core set of policy elements; and, develop a decision tree that allows for an airport to develop and refine its safety policy. The airport should also report on what policy or format works best in their operating environment and if they have made any changes to their SMS Program to incorporate findings under this task.*

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# 1. Introduction to Safety Policy Development for Airports

## 1.1 *What is a Safety Policy?*

At the heart of a Safety Management System (SMS) is the overarching Safety Policy that guides and commits the organization, its staff, and tenants to safe operations. A Safety Policy is often comprised of a mission, a vision, core values, and is backed by quantifiable program objectives or goals.

Additionally, the Safety Policy works in conjunction with the identified roles and responsibilities of the assigned SMS staff to ensure accountability at all levels of the organization (see SMS Roles and Responsibilities). Airports may have existing policies that may require revisions to reference or include the Safety Policy. Airports may need to develop a new Policy to support the new SMS.

## 1.2 *Why do I need a Safety Policy at my Airport?*

SMS is a program comprised of individual elements that requires oversight by management and buy-in from staff and tenants. One of the first steps to developing a SMS is creating a Policy to share the airport's safety commitment and to define the program objectives and goals. Without a formalized policy, the program cannot be staffed, communicated, adhered to, measured, monitored, or continuously improved. The Safety Policy provides the shape and content of the SMS and typically includes a commitment to safety by top management.

## 1.3 *How do I get started?*

A Safety Policy needs to reflect the organization in which it is authored. Airports can collect other Safety Policies to gather ideas and possible content, but each airport should develop a Policy that is specific to their organization and safety culture. The following provides a quick overview of ways to get started including who should be in the Policy Work Group, recommended Policy sections, questions that should be asked while developing the Policy statements, and, most importantly, the processes necessary to develop and publish a Policy.

### 1.3.1 Decide What Statements to Include

For a Class 1 airport, the following five Policy sections are recommended:

1. Philosophy – a safety vision or mission which ultimately describes or defines the SMS safety intentions and core beliefs
2. Management Commitment – a statement from top management committing to safety throughout the organization
3. Safety and People – statements about how people are expected to behave, report, and work under the Safety Policy and including accountabilities and responsibilities of management, staff, and tenants
4. Safety and the Facility or place of Operation – statements about how management will maintain a safe place for people to work

5. Program Oversight and Audit Responsibility – statements ensuring that management will continuously review and revise the program; that a SMS is never finished

Each of these statements forms a cohesive Safety Policy that together ensures a consistent and credible message is delivered to staff and tenants. As mentioned earlier, the Safety Policy should not be overly formal; language should be direct, easy to understand and as colloquial as possible.

### 1.3.2 Create a Work Group

Creation of a Policy Work Group is recommended for research and authoring of the airport's Safety Policy. Members of the Work Group should include senior management as well as additional staff who are stakeholders in the SMS including Airport Duty Managers (ADMs), Airport Operations Specialists (AOSs), Safety Specialist, or equivalent staff, etc. It is important that the Work Group not be so large as to limit its productivity but that it is inclusive enough to ensure the Policy not be authored in isolation.

A number of scheduled meetings should be established to ensure the Policy development pace and timeline is maintained. If possible, meetings will be off site to eliminate/reduce interruptions. Engaging an outside facilitator to guide the meeting is recommended; a facilitator will assist in flattening organizational hierarchies as well as diffusing strong opinions that can result from the process.

The Work Group should tackle the mission/vision statement first and work their way through the 4 other sections in separate meetings. While developing the Policy, the Work Group should consider program management oversight, audience and relevance, and transparency (especially as it relates to future audits and program reviews). In addition, the Work Group should develop associated program goals and objectives that support the Policy. See Section 3 for Goals and Objectives.

### 1.3.3 Develop a Policy

An important aspect of the Policy is the language and its effectiveness within the safety community and associated audience. While the Policy must pass legal and risk department reviews, it must also resonate with the audience which typically comprises airport staff and tenants including airlines, ground service providers (GSPs), and concessionaires. Sea-Tac's airport community is made up of many cultures, languages, and backgrounds. In fact, a large percentage of the airport community speaks English as a second language. The proposed Policy should be written in a way that is easy to understand and adhere to; the Policy language should be direct, simple, and transparent.

For each of the five Policy sections, the Work Group should ask a variety of questions to assist in developing the Policy. See Section 2 Sample Policy Statements associated with each section.

#### 1 Philosophy

- What is the organization's core value with regard to safety?
- How does the organization treat its staff and tenants today?

- Describe today's safety culture. Does it align with the new proposed Safety Policy? If not, how will the gap be bridged?
- Who in the organization needs to be involved in developing the mission/vision of the Safety Policy?
- How many stakeholders should make up the Work Group team to effectively author and deliver the Safety Policy? Who are they?
- How much time (effort and duration) should be committed to authoring the Policy?
- In what style or tone should the Policy be written?

## 2 Management Commitment

- What is upper management actually willing to commit to?
- How will upper management communicate the commitment?
- Will management demonstrate the commitment verbally and through their actions?
- Will the Policy compromise management's business and financial objectives? If so, how will safety be integrated into the organizational goals?
- Who will approach management for commitment and buy off?
- At what point should management be involved in reviewing the Safety Policy?

## 3 Safety and People

- How is safety communicated today?
- What other safety programs exist?
- What about Rules and Regulations? How are they rolled into the new Policy?
- How are citations integrated into the new Safety Policy?
- Who has ultimate decision making powers about people and safety?
- How will the organization change perceptions about safety?
- What other programs have succeeded that involved the entire organization? What can be leveraged or learned from those successes?

## 4 Safety and the Facility or place of Operation

- What other departments need to buy in to support facility safety?
- How will airline and GSP management participate and report safety concerns?
- How is the message delivered throughout the organization?
- What if a safe environment requires a significant increase in budget?

## 5 Program Oversight and Audit Responsibility

- How will the program remain fresh and interesting to everyone?
- What will be measured and how?
- How and to whom will results be reported?
- What happens if the program starts to fail?
- Who is accountable for the program success?
- Who conducts the audits? Internal or external?

### 1.3.4 Review Policy with Staff and Management

It is assumed that a series of draft SMS Policies will be authored, reviewed, and revised. As the Policy document evolves, staff outside the Work Group should be asked to review and comment on content, language style, cultural representation, and overall format and tone. This information should be collected and reported back to the Work Group.

Additionally it is recommended that the Policy be viewed by small focus groups of tenants, especially those with language challenges to ensure they understand and will be able to comply with the Policy.

### 1.3.5 Approve and Publish the Policy

Once your Work Group has developed the Policy, and reviewed it with staff and management, it should be officially approved and published. The process for creating and publishing the official Policy may differ between airports but, in general, the following steps are likely:

1. ,
2. Submit the policy for attorney review - The policy can be reviewed by any legal counsel that is or has been associated with the work group
3. Approval by the attorney who signs off on the policy
4. Submit the policy to the Accountable Executive for final approval
5. Upon final approval publish the policy

In addition to initial approval and publishing, your Work Group should identify the process for revisions to the Policy. The process may be dependent upon how substantive a change is being made (i.e., updating links to other policies vs. making significant changes to content).

In addition to the above process, the Safety Policy should be distributed throughout the organization as part of a formal communication plan. In addition to providing hard copies and email distribution, the Policy should be published on airport Intranet and Internet sites for wide consumption. Initially the target audience will likely be Station Managers and Ramp/Safety Managers; but as the program is rolled out, all airport and tenant staff should be informed of the Safety Policy through SMS orientation and training.

The diagram on the following page presents the likely steps necessary to author, review, and approve the Safety Policy. Note that current Rules and Regulations and tenant Lease Agreements should be assessed as part of the Policy development process to ensure any Policy changes are reflected accurately in each of these supporting documents and programs.

Also note that the Policy should be reviewed on an annual or periodic basis to ensure it meets the safety community goals and expectations.

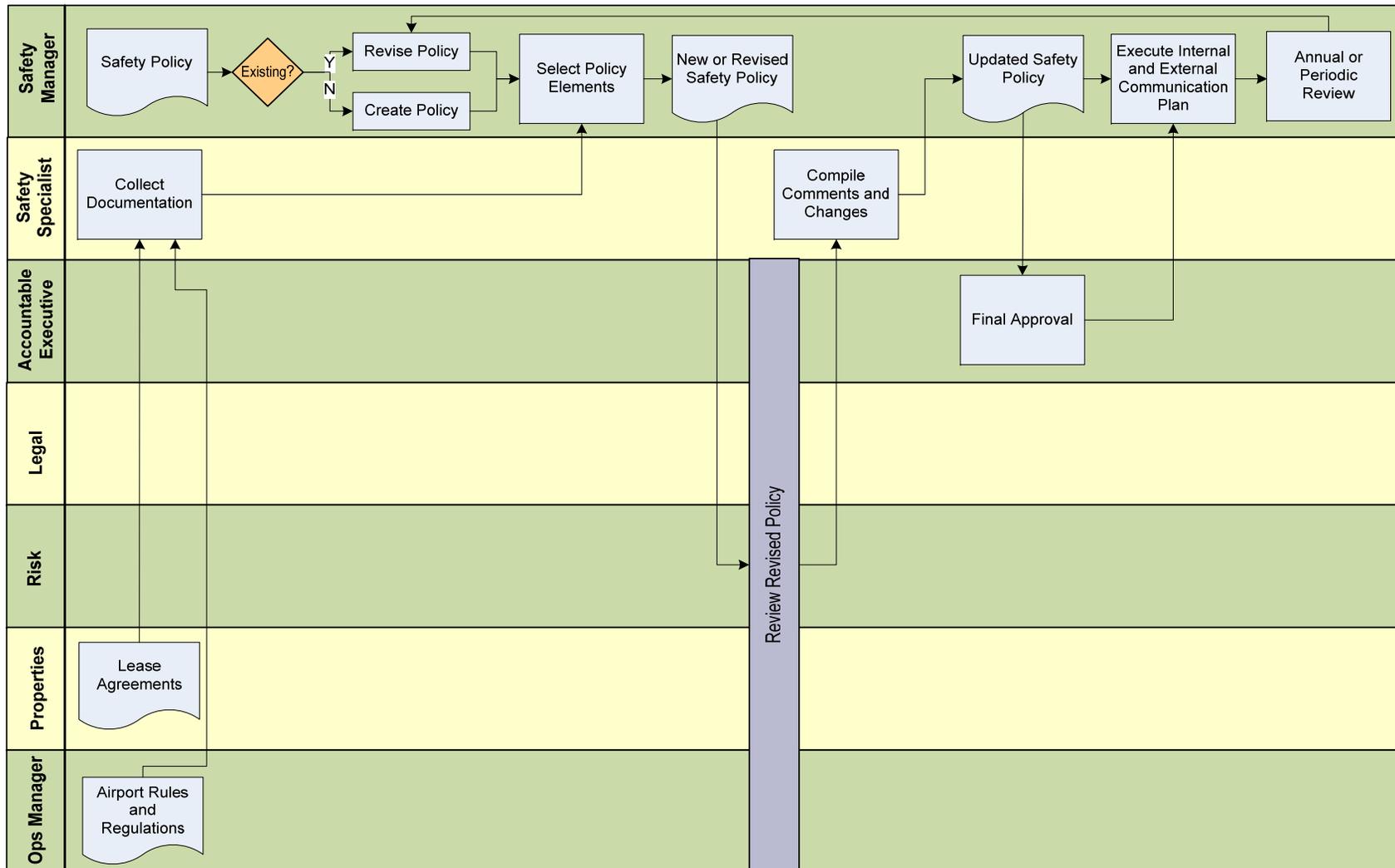


Figure 1 - Sample Policy Approval Procedure

### **1.3.6 Communicate Policy with Staff and Management**

Once the Policy is completed, it should be rolled out to all staff and tenants through a formal communication program. The Policy will likely be one of the first steps to launching an airport's SMS and therefore will provide an opportunity for management to discuss safety concerns, safety reporting, and safety orientation. It is important that other elements of the SMS program be well defined prior to rolling out the Policy to ensure staff and tenants questions are answered with a level of detail and depth to gain confidence in the program, and to support the Policy and the safety initiatives associated with the SMS.

## **2. Sample Policy Statements**

The table on the following page provides a list of possible policy statements, descriptions, and examples from existing and proposed Safety Policies. Airports may select statements from this table or create additional statements as a function of the Safety Policy Work Group. Airports may elect to develop separate Policies in support of other SMS elements, such as a non-reprisal/non-punitive program. However, it is recommended that the Safety Policy be as comprehensive and inclusive of all related SMS policies as possible. This will provide efficiency in publishing and maintenance of relevant SMS policies.

#	Primary Policy Sections	Description	Examples
1	Statement of Intent Philosophy Mission/Vision	This statement typically describes the program with regard to management or organizational culture. These statements let everyone know that safety is part of the business at the core of operations.	<ul style="list-style-type: none"> <li>• Safety is a priority in our organization</li> <li>• Safety makes good business sense</li> <li>• Safety is measured, monitored, and celebrated</li> <li>• The Safety of people and property is the highest priority at all levels of the organization</li> <li>• Operating with the highest reasonable level of safety equals success</li> <li>• All safety issues will be openly and sincerely reviewed to prevent incidents and promote safety.</li> <li>• All accidents and incidents are preventable</li> </ul>
2	Management Commitment	A statement from management indicating that the accountability and associated liabilities lie with upper management. That management is agreeing to develop, maintain, and most importantly reflect (walk the talk) a safe work place.	<ul style="list-style-type: none"> <li>• Safety excellence will be a part of our mission</li> <li>• Senior management will hold everyone accountable for safety</li> <li>• We will recognize and reward high safety performance</li> <li>• We will never change measurements to improve safety records</li> <li>• Safety gets to go to the top if it isn't fixed at the bottom</li> </ul>
3	People Just Culture Non Retribution	SMS strives to ensure that staff and tenants are safety conscious and safety aware. Also, SMS encourages open reporting of safety concerns and hazards. These statements let everyone know that it is ok to talk about and report safety concerns.	<ul style="list-style-type: none"> <li>• Be Safe, Safety is everyone's business</li> <li>• Safety is part of everyone's job</li> <li>• Safety applies to everything we do, no exceptions</li> <li>• Everyone promotes a culture of safety always</li> <li>• Reporting accidents and incidents is a way to improve safety</li> <li>• Talking openly about safety makes it better for everyone</li> <li>• Hazardous behaviors are risky for everyone</li> <li>• Hazards are dangerous for everyone</li> <li>• Everyone will learn as much as they can about safety</li> <li>• Everyone takes time to understand the Safety Policy</li> <li>• Management will make sure the SMS Program is staffed for success</li> </ul>

4	Facility	Staff and tenants should be confident that the work place is safe from hazards and harm. If equipment or conditions are hazardous, the organization is committed to reducing the hazards and associated risks to ensure a safer environment.	<ul style="list-style-type: none"> <li>• Equipment I use to do my job works like it should</li> <li>• I am able to “tag out” equipment if it is not safe</li> <li>• My work place is safe</li> <li>• I can let someone know if I don't feel safe about my work area or equipment</li> </ul>
5	Program Oversight Audit	These statements provide information on how the SMS program will be managed and continuously improved over time. These statements tell everyone that safety is an ongoing concern.	<ul style="list-style-type: none"> <li>• Safety can always be improved</li> <li>• Safety management can always be better</li> <li>• Management will always try to do exceed standards</li> <li>• Management will always do better than is regulated</li> <li>• Safety will be measured and reported to everyone</li> <li>• Safety will be managed efficiently</li> <li>• Safety management/improvements never stops</li> <li>• We can make a safe system safer</li> </ul>

**Table 1 - Sample Policy Elements**

### **3. Policy Objectives and Goals**

A set of program goals and objectives should be aligned with the Safety Policy. To ensure the SMS can be measured, a collection of measurable objectives and associated short, mid, and long-term goals should be developed. As a reflection of the entire program philosophy about safety, the Safety Policy merits quantifiable and reportable metrics that support the SMS.

Safety Policy encompasses program vision, management commitment, people, facility, and continuous improvement. Each of these Safety Policy sections should include specific objectives and goals that reflect on the program and expected outcomes and, most importantly, can be measured. For the safety community, it is important to see improvements in safety in quantifiable means.

When a SMS is implemented, safety reporting may appear to indicate a higher number of safety hazards and occurrences (incidents, accidents and near misses); however, initial reporting may merely reflect activities that were not reported in the past. Any improvements in safety must pass a “reality check” in which metrics and actual safety operations and safety culture are aligned. As objectives and goals are established, this relationship between data/metrics needs to be addressed to ensure measurements are not fabricated or derived from a narrow set of data elements. The purpose of tracking will be to engage the safety community in what is working and what is not working to further improve the SMS and to isolate aspects of the SMS that need further refinement.

Objectives and goals should be developed with the understanding that both management and program participant expectations need to be met.

Safety Objective	Associated Goals
Operationalize the SMS management program in 3 years	<ul style="list-style-type: none"> <li>• Hire or contract a Safety Manager by the beginning of year 1</li> <li>• Hire outside help if no internal staff is available by the beginning of year 1</li> <li>• Identify existing staff and roles and responsibilities by the end of year 1</li> <li>• Transition to internal team by the end of year 2</li> <li>• Have adequate staff in place and trained to operate the SMS by year 3</li> </ul>
Train all internal staff by year 2	<ul style="list-style-type: none"> <li>• Conduct 100% of all training to internal staff by the end of year 2</li> <li>• Establish initial and recurring training program objectives for all relevant staff by the end of year 1</li> <li>• Test staff knowledge and competencies through staff observations by the end of year 2</li> <li>• Refine the training program to reflect staff training improvements by the end of year 2</li> </ul>
Orient all external staff by year 4	<ul style="list-style-type: none"> <li>• Develop an orientation program by the end of year 1</li> <li>• Incorporate pilot orientation training by the end of year 1</li> <li>• Refine orientation training by the end of year 2</li> <li>• Roll out orientation training to all external staff by the end of year 3</li> <li>• Include all external staff in initial and ongoing training program by the end of year 4</li> </ul>
Increase attendance at Safety Action Committee Meeting by 20% by the end of year 2	<ul style="list-style-type: none"> <li>• Contact all Station Managers and Ramp/Station managers to encourage participation by year 1</li> <li>• Orient all to the hazard reporting process and resolution by year 1</li> <li>• Conduct site specific analysis by the end of year 2</li> <li>• Formalize attendance and participation reporting by the end of year 2</li> </ul>

<p>Develop and test Risk Sub committee functions by year 2</p>	<ul style="list-style-type: none"> <li>• Select internal (Port) and external (tenants) risk sub committee members for orientation training and awareness by year 1</li> <li>• Compile a list of members and skill sets by year 1</li> <li>• Select specific high hazards to test by year 1</li> <li>• Formalize staff meeting staff requests and capabilities by year 2</li> <li>• Conduct formal assessments of high risk by year 2</li> </ul>
<p>Decrease FOD issues by year 2</p>	<ul style="list-style-type: none"> <li>• Launch extended FOD program by year 1</li> <li>• Identify all gate/GSP tenants by year 1</li> <li>• Collect FOD program information and schedules by year 1</li> <li>• Orient identified tenants to FOD issues by year 2 (see FOD Program)</li> </ul>
<p>Increase hazard reporting by 30% by year 2</p>	<ul style="list-style-type: none"> <li>• Develop portal and other reporting sources by year 1 to collect hazards, accidents, and incidents and establish baseline data</li> <li>• Establish self-inspection program for ramp, cargo, and bagwell by year 1</li> <li>• Communicate and orient all internal and external POS and tenant management staff to reporting processes by year 1</li> <li>• Extend reporting orientation to mid-level management by year 2</li> <li>• Establish response and reporting program by year 2</li> </ul>
<p>Decrease accidents/incidents/near misses by 20% by year 3</p>	<ul style="list-style-type: none"> <li>• See above portal objective and goals</li> <li>• Collect information, de-identify if necessary, and report out to tenants on safety issues by year 2</li> <li>• Review reports collectively (Safety Action) and develop mitigation strategies by year 2</li> <li>• Trend, and report on improvements by year 3</li> </ul>
<p>Conduct the first program audit (QA) by year 3</p>	<ul style="list-style-type: none"> <li>• Collect above baseline data results for reporting by year 2</li> <li>• Develop a staff (internal and external) survey to supplement reporting data by year 2</li> <li>• Compile findings (survey and data) and report by year 3</li> </ul>

**Table 2 - Goals and Objectives**

## **4. Summary of Findings**

When challenged with writing a set of Policy statements that reflect an airport's culture and safety objectives, many examples read like legal documents. If an airport wants to communicate with its community, breaking down the statements in phrases that are straight-forward and simple will assist in getting the message delivered to the entire airport and will support the safety culture and discussions about how management truly believes in safety.

Without top management's commitment to safety, both written and practiced, the Safety Policy cannot be upheld as the guiding document to the SMS. For its successful implementation top management must be convinced that the SMS and, by extension, the Safety Policy, is good for business and that SMS does not compromise other financial and organizational objectives.

Goals and objectives that are developed in parallel to the Safety Policy must be reasonable and attainable. The Safety Manager and top management jointly will be accountable for reaching goals, reporting on failures and successes and communicating results. Airport management is intrinsically knowledgeable about the culture, staff, and programs that have worked in the past, and what has not. The most effective method of identifying goals, objectives and timelines will be to reflect on this organizational knowledge and the airport's strengths, weaknesses, threats and opportunities (SWOT). Developing Safety Policy and objectives/goals can be an excellent way to engage all levels of the organization to measure safety culture and staff engagement. If the Safety Policy development and promotion does not succeed, deploying other aspects of the program may be compromised. Bearing this in mind, the Policy Work Group should ensure that objectives and goals are challenging but attainable with dedication and commitment. Making promises that the program cannot deliver will create future problems and encumber the elements of the SMS that are successful.