

**Report of the ICAO Safety Management Panel (SMP)**

Presented by Andrew Belshaw

**SUMMARY**

The ICAO SMP held one in-person meeting this year, hosted by EUROCONTROL at their Haren HQ in Brussels. IFATCA attended both the plenary virtual and the Brussels meeting, participating in WG2 Safety Management Systems. The work was a continuation of the previous meeting held in Montreal.

**1. INTRODUCTION**

1.1. The ICAO SMP met in person at EUROCONTROL Brussels between the 5th – 9th February 2024. The SMP is comprised of 40 Members by 30 Member States and 10 International Organisations of which IFATCA is one. IFATCA was represented by Andrew Belshaw (GATCO).

**2. DISCUSSION**

2.1. The meeting agenda was as follows:

<b>Monday 0800-1130 Montreal Time</b>	
<b>Agenda Item 1</b> 1.1: 1.2: 1.3:	<b>Opening (30 min)</b> Opening of the meeting Organization and administrative notes Review and approval of agenda
<b>Agenda Item 2</b> 2.1: 2.2:	<b>Secretariat updates (30 min)</b> Status of Annex 19 – Safety Management, Amendment 2 Proposals Status of Safety Management guidance material
<b>Agenda Item 3</b> 3.1: 3.2: 3.3: 3.4: 3.5: 3.6:	<b>Review of SMP Work Programme (120 min)</b> Job card SMP.020 Job card SMP.021 Job card SMP .023 and 024 Job card SMP.025 Focal points and coordination with other ICAO expert groups Review of SMP Structure to support work programme

<b>Tuesday morning 0830- 1200</b>	
<b>Agenda Item 4</b> 4.1: 4.2: 4.3: 4.4:	<b>Joint Task Team for Job card SMP.020 session (0.5 day)</b> Review and update of work plan Progress deliverables Future teleconferences and meetings Other topics to be addressed
<b>Tuesday afternoon, Wednesday and Thursday</b>	
<b>Agenda Item 5</b> 5.1: 5.2: 5.3: 5.4:	<b>Working Groups sessions (2.5 days)</b> Review and update of work plan Progress deliverables Future teleconferences and meetings Other topics to be addressed
<b>Friday morning 0900- 1300</b>	
<b>Agenda Item 6</b> 6.1:  6.2:	<b>Debriefing by Joint Task Team and each WG (30 min each)</b> a) Progress made b) Challenges identified and proposed solutions c) Future work planning Miscellaneous items (15 min)
<b>Agenda Item 7</b>	<b>AOB (15 min)</b>

2.2. As at the previous meeting in Montreal, the IFATCA representative participated in Working Group (WG) 2 – Safety Management System (SMS). WG2 was tasked with continuing the review of Chapter 9 of the ICAO Safety Management Manual (SMM). Chapter 9 focusses on Safety Management Systems.

2.3. The discussion focused on the following topics:

- Safety Policy
- Hierarchy of SPIs, SPTs and Safety Objectives
- Accountable Executive
- Appointment of Key Personnel
- SMS Documentation
- Safety Risk Management
- Safety Assurance
- Management of Change
- Training
- Communication, and
- SMS Implementation

In addition, WG2 discussed the following items.

#### **2.4. Agenda Item 5.1: Review and update of work plan**

- 2.4.1. SMS WG agreed that Job card 25 falls naturally within the scope of WG2 and will propose that it assumes responsibility for its development.
- 2.4.2. The group also looked at the remaining actions in the workplan and will tackle them as appropriate, with the corresponding SEC or POC support.

#### **2.5. Agenda Item 5.2: Progress deliverables**

##### 2.5.1. IP 01- Comments forwarded to SMP from Annex 9 Amendment 2 consultation

- 2.5.1.1. The group agreed that recommendation 24 to revisit the requirement of the Standard to include “unacceptable behaviours” in the safety policy is not conducive of a good safety culture and should be rewritten, however this will be addressed for Amendment 3 of Annex 19.

##### 2.5.2. WP 01 – Systems thinking tenets

- 2.5.2.1. In a general sense, WG 2 supports outlining tenets to be considered when applying a risk assessment method. However, the group agreed that without additional information and research it is difficult to tell if the list is complete or if any tenet is missing. Nevertheless, the number of tenets should be kept at a reasonable number. Revision of other materials related to system thinking that already expand on such principles (e.g. Systems Thinking for Safety: Ten Principles | SKYbrary Aviation Safety) could highlight further areas for consideration.

##### 2.5.2.2. Main outcomes of the discussion:

- The system thinking approach is valuable in its own right and could exist as a separate advice to assist in the choice of methodologies.
- Clarify what are the next steps in the use of these tenets.
- A formal evaluation and selection of methods should be neutral and balanced to encompass even new methodologies that may emerge in the future.
- While there is great value in incorporating system thinking for identifying safety issues, the risk assessment process could use different approaches.
- The translation and the description columns may need more alignment. This was especially identified in the “feedback” tenet which has a definition encompassing an element of the impact and

understanding that is not expressed in the “translation” column. The continuous improvement feedback loop was also not clear in the statement.

- Wording of the translation column needs consistency along the tenets.

- The “translation for risk assessment methods” needs consistency in expressing the evaluation of the risk method not the characteristics of the system process.

2.5.2.3. WG2 also offers some suggestions of rewording as commented in the table.

Description	Tenet	Translation for risk assessment methods
<p>Risk is an emergent property of complex socio-technical systems. It is impacted by the decisions of all actors in the system and not just front-line workers.</p>	<p>Multiple actors and levels</p>	<p>The method identifies actors, decisions and actions involved with the provision of the task.</p>
<p>Risks are usually caused by multiple contributing factors across multiple levels of the organization, not just a single catastrophic decision or action.</p>	<p>Multiple contributing factors</p>	<p>Multiple hazards and risks are considered within and between all levels of the system, and not solely by those at the sharp end, or solely by one ‘catastrophic’ or ‘obvious’ risk/hazard.</p>
<p>Risks can result from a lack of vertical integration (i.e., mismatches) across levels of a complex socio- technical system, not just from deficiencies at any one level alone.</p>	<p>Vertical integration</p>	<p>The method enables the deliberate provision of communication opportunities between actors and artefacts, in relation to hazards and risks, at all levels in the system, and not solely between those positioned at the front line.</p>
<p>Lack of feedback also leads to loss of vertical integration across multiple levels. Actors are not able to see or anticipate the impact of their decisions, so risks are not obvious before an accident.</p>	<p>Feedback</p>	<p>The method offers opportunity for actors in the system to verify that actions, decisions, and communications have been received and understood as intended.</p>

Risks are not static and tend to migrate over time under the influence of a cost gradient driven by financial pressure and an aggressive competitive environment. Work practices also migrate under an effort gradient driven by psychological pressure to follow the path of least resistance.	External pressure	The method purposefully considers and evaluates potential external pressures impacting actors and artefacts across all levels of the system. The method enables new and emerging hazards and risks to be frequently considered and is not simply a repeat of past iterations; irrespective of past accident performance.
Risks occur at multiple levels of the organization, not just one level alone.	Migration of work practices at <del>multiple levels</del> Can be within and across levels	The method is adaptive enough to enable ongoing, dynamic risk assessment to occur.
The migration of work practices over time leads to the gradual erosion of the systems defenses. Risks occur as a combination of this systematic migration and a triggering event, rather than by the occurrence of an unusual action or one-off threats to safety.	Erosion of defenses <del>through migration of work practices</del> (Erosion of defences can happen without migration)	The method seeks to provide context to current work practices, influences, and hazards.

2.5.2.4. SMS WG suggests publishing the tenets as guidance letting practitioners evaluate the methodologies for themselves instead of selecting just a few of them as a panel.

2.5.3. WP.02 - RPASP-SMP-JTF Coordination

2.5.3.1. The group suggests adding a separate evaluation on Annex 19 and how it applies to RPAS in current and future amendments. In addition, there are lists of documents to be considered by RPAS operators (example 6.24.1), so it would be important to make sure that safety management document references are included as applicable. The document will be further considered for a future virtual meeting and further feedback, if any, will be provided. Participation to the RPASP/SMP-JTF from WG2 was discussed, but no change suggested.

2.5.4. WP 03 – SMS for RPS

2.5.4.1. Support for the proposed option 3 as laid out in the Appendix RPASP/22-WP/8. No additional coordination was considered

necessary. Sector specific examples could be in the SMI website like other sectors.

2.5.5. WP 05 – Annex 1 and PANS-TRG amendments.

2.5.5.1. The group suggests suppressing the provision included in item 4.2 which is a duplication of a standard already present in Annex 19. The group equally suggests suppressing the recommendation in item 4.3, as it would be best addressed by current Annex 19 provisions allowing discretionary applicability of such provisions by the States.

2.5.5.2. The group considered that the risks introduced by organizations mentioned in the recommendation would be captured in their SMS. Other cases in which training organizations would cause safety impacts can be addressed by the States using their discretionary powers afforded by Annex 19. In addition, the broad scope of impacts that could be introduced by these activities is generic and needs to be specific about safety.

2.5.6. Chapter 9 - SMM

2.5.6.1. (9.7.1.2) Editorial adjustment considering the sentence was too broad.

2.5.6.2. (9.7.1.3) Text on documenting system description and interfaces was adjusted to emphasize there is no need for a separate document to be included in the SMS documentation, but the system description should be somehow included in the documentation. The group also considered the value of the rest of the paragraph in highlighting the use of visual representation of how the system works. 9.7.4.12 Paragraph included to reflect the experience on integration of SMS between different organizations.

2.5.6.3. Comments not answered in previous meetings were reviewed (9.5 (line 15); 9.5.5 (line 16); 9.5.5.6 (line 17); 9.5.5.5 (line 19); 9.4 (line 18)) resulting in the following changes. 9.5.5.6 (line 17) The group agreed on adding the cultural aspect of change management, including a general reference on how the culture may be affected by change in the long term.

2.5.6.4. 9.4 (figure 9-1) Figure should be redone by the SEC to ensure consistency with Chapter X.

**2.6. Agenda Item 5.3: Future teleconferences and meetings**

2.6.1. The group agreed on monthly meetings starting in March and then readjust as necessary.

2.6.2. The group also wondered about the dates and location of the next in-person combined WG meeting, which should be held in 2025, between the two Panel meetings of 2024 and 2026.

## **2.7. Agenda Item 5.4: Other topics to be addressed**

2.7.1. The group discussed several other items which were brought forward spontaneously by the members:

2.7.1.1. Regarding the potential merger of WG1 and WG2, the group is not in favour, for a number of reasons:

2.7.1.1.1. The size of the merged group would become too big and likely difficult to manage;

2.7.1.1.2. This may lead to a permanent substructure of task groups, effectively mimicking the current structure;

2.7.1.1.3. The focus and composition of WG1 is mostly States, while WG2 has a more balanced presence of States and SPs. If the groups were merged, the State presence and focus might overpower the SP work;

2.7.1.1.4. SEC support is important and much appreciated, but the constraints within the SEC shouldn't drive the work allocation of the Panel.

2.7.1.2. The group suggested to compare the Job Cards and work ahead for a potential decision on the future work structure.

2.7.1.3. JC21 raised some concerns regarding the potential redefinition of the safety risk and its significant implications for States and SPs. WG2 would like to know if the work has already been allocated. WG2 would like to be involved, as appropriate.

2.7.1.4. WG2 felt the plenary time is useful and productive, so it would support more such plenary time at future in-person meetings, whether they are Panel or WG meetings.

2.7.1.5. WG2 suggests running the next survey on Annex 19 shortly, such that results are available in time to be used for Amendment 3.

2.7.1.6. WG2 would welcome a final overall report from this meeting.

## **3. CONCLUSION**

3.1. Another very successful and interesting week. It is clear that a face-to-face session is invaluable. Unfortunately, due to a family bereavement, I have not been able to attend recent follow-up virtual meetings.

## **4. RECOMMENDATIONS**

4.1. It is recommended that this working paper is accepted as information.

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