

The Numbers

As of 1 July 2011 IS-BAO had 523 registered operators of which 54 were Stage 3, 95 Stage 2 and 374 Stage 1 SMS maturity. Approximately 150 of the total number of registrants are commercial operators.

Introducing the IS-BAO Users Forum

Over the past six months we have received suggestions that we adapt the IS-BAO Airmail system to be a two-way communication facility where IS-BAO users could exchange information and canvas their peers for input to IS-BAO or SMS problems or concerns that they may be facing.

Accordingly, we have initiated an IS-BAO Users Forum on the IBAC web site at http://www.ibac.org/is_bao/is-bao-forum. To access the Forum login with the User Name and Password that you were given to download the 2011 edition of the IS-BAO. You will find the link for the IS-BAO Users Form in the lower left hand corner of the.

If you do not have a user name and password please send a message to administration@ibac.org and Paul Lessard will provide them to you.

At this point we would appreciate your comments on the Forum, the Topic List that we have developed and the related processes. Please send your comments to administration@ibac.org or rayrohr@telusplanet.net, otherwise go ahead and start using the Forum.

Helicopter Progress

Revisions to the standard to make the IS-BAO compatible with helicopter operations are complete. This revision will not be a helicopter version, rather a *universal* standard for all business aircraft operations. However, some provisions will incorporate specific helicopter standards and recommendations. The amended version will be reviewed by the Standards Board at it's October meeting.

Who's Your Audience?

For whom do you write your audit report? The flight operation's manager, chief pilot and director of maintenance quickly come to mind, but there are a few more groups to consider.

Because of your outstanding prose the flight department's company reporting senior and, perhaps, other company executives, including the owner/CEO, may want to see at least parts of it. Ideally, the report should also be shared with all members of the flight

operation so that they may properly bask in the glow of achieving IS-BAO registration and understand improvement opportunities that were identified.

From a historical perspective new flight department management personnel may wish to review the previous audit to properly prepare for the upcoming one. Last, but not least, the IS-BAO Audit Review Group that will carefully review the results of your auditing efforts to ensure conformance to both the standards and auditing procedures. While not normally mentioned, the audit documents also become legally discoverable materials in the event of any possible judicial action.

Therefore, because there are a variety of target audiences for you to consider, please write the report including:

- All candidate audiences in mind,
- Complete phrases or sentences,
- Comments to explain critical concepts and situations,
- A minimum of jargon, abbreviations or cryptic remarks, and
- Complete statements including references, situations, manual titles and processes.

Findings

As an increasing number of registrants approach Stages 2 & 3, it is important that findings be correctly assessed. This is because in the advanced stages the operator is supposed to have correctly established the foundation for IS-BAO conformance and must now ensure sustained performance and continuous improvement of their SMS.

A major issue the audit review group encounters for all IS-BAO stages is the failure of the auditor to fully assess the cause(s) of non-conformities. There is a tendency to cite *evidence* of a non-conformity as the finding itself. This is akin to attempting to treat a symptom instead of the disease. Further, auditors often cite the failure to conform to a specific standard as the finding itself. While this may be true in certain instances, there may be a pattern of oversight, communication or management failures that are behind the obvious non-conformity. This is especially the case when there are a series of similar non-conformities connected by technical document control, training, safety assurance or management/employee involvement.

Auditors must look beyond obvious non-conformities and seek a central causal factor such as lack of oversight, authorities not properly designated, failure to exercise change and risk management techniques or just plain poor management.

It is all too easy for an operator to respond to a simple non-conformity required by the standard with a manual change, but much more difficult when confronted with a series of faults linked by a single higher level error. Take time to determine the *real causes* of non-conformities. Review chapters 5 and 6 of the Audit Procedures Manual.

The Perfect Audit – Is there such a thing?

We receive a number of audits containing no findings accompanied by very few comments. While it is gratifying to see that so many operators may be such stellar performers as to warrant a *perfect* audit report, the complexities involved and level of detail required by IS-BAO reduce the probability of such an occurrence.

Looking beyond the abbreviated statement of standards shown in the protocols may provide a more comprehensive perspective on standards conformance. For example, protocol 3.2.1, Safety Policies and Objectives, states requirements for documentation of certain aspects of the SMS, however in support of these items the *standard* requires provision for necessary resources and "...be communicated, with visible endorsement, throughout the organization." And, 5.1.2, requirement to include training programs in the COM, also requires the inclusion of or reference to a course outline in the COM.

Additionally, it may be easy to pass off as a foregone conclusion a requirement like 6.7.1, Aircraft Operating Requirements, which requires a *process* for identifying and complying with all aircraft operating rules.... This requires a major effort to identify all requirements, ensure compliance and to *record proof of compliance*. We see almost no comments regarding this important requirement, merely a lone check mark in the "Y" column.

IS-BAO thrives on *full* conformance with all standards. Look beyond the basics and obvious requirements and delve into the issues that ensure the operator is doing the job correctly and completely. If you do you will likely be able to help operators use the IS-BAO requirements to manage the safety, security, efficiency and effectiveness of their operation.

IS-BAO Annual Revision Cycle

August brings the start of the annual IS-BAO revision cycle. If you have any items that should be considered for revision of the IS-BAO, Audit Procedures Manual, GCOMs or SMS Toolkit please pass them to Jim Cannon jim_cannon@bellsouth.net or Ray Rohr rayrohr@telusplanet.net.

Auditor Accreditation Workshop Schedule

Those auditors whose accreditation expires this December should be making plans to attend an accreditation workshop soon. We will be adding a few additional US workshops prior to year end so monitor http://www.ibac.org/is_bao/is-bao-workshop-schedule closely.

Bits and Pieces

- Stage 1 audits require an SMS evaluation for both Soundness and Appropriateness for of all 13 elements of listed on the 8.1 form with the exception of items 9 & 11 for Appropriateness (APM 5.8.1). A Stage 1 effectiveness

evaluation is not required for any element since there is seldom sufficient evidence from which to make a judgment

- Protocol chapter 13, OSHA are required for operator employees regardless of whether in-house maintenance is provided. Personal safety training and protective equipment must be included.
- If an operator does not perform any of its own aircraft maintenance it is still responsible for conforming to all standards shown in Chapter 9. This requires oversight and feedback procedures to ensure that all standards are complied with.
- We are receiving an increasing number of comment forms from registrants citing poor performance by auditors in preparing the operator for the auditor's visit. Use the Audit Planning Letter sample shown in Appendix C of the Audit Procedures Manual to start the process of informing the client of your intentions.

Keep up the good work.

John Sheehan
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Have you reviewed the Audit Procedures Manual lately?