IS-BAH Policy 2012-03

Subject – IS-BAH SMS Progress Requirements

Effective: July 1, 2014

1. Purpose

This IS-BAH Policy has been developed to clarify the SMS performance requirements for IS-BAH registration, and to provide for provisional operator registration under certain circumstances.

2. Discussion

The core concept of IS-BAH centers on the Safety Management System (SMS). Because of this IS-BAH standards specify that: "The organization shall develop and maintain a formal process that:

- ensures hazards in operations are identified
- ensures analysis, assessment and control of the safety risks of the operation
- develops and maintains the safety performance of the organization and to validate the effectiveness of the safety risk controls
- [identifies] changes within the organization which may affect established processes and services….
- [identifies] the causes of substandard performance of the SMS … and eliminate or mitigate such causes."

These provisions paraphrased from Standard 3.2 demonstrate that the SMS is functioning and the results are being measured.

In recognition of these ongoing SMS requirements IS-BAH provides for three stages of SMS development to ensure program maintenance and progress. The meaning of the three levels indicates that an operator's SMS is:

- Stage 1   - documented, approved, resourced and being implemented
- Stage 2   - functioning with the results being measured
- Stage 3 - sustained and supported by an ongoing improvement process and a positive safety culture is sustained

Therefore, Stage 2 and 3 audits must demonstrate higher levels of SMS as provided for in IS-BAH Standard 3.2. Non-conformities found in Stage 2 or 3 audits that materially degrade the effectiveness of SMS performance will be considered to be major non-conformities, which require full remediation prior to granting a Stage 2 or 3 registration.

It is important to emphasize that current IS-BAH Policy is designed to assist the operator in the growth and maturity of their SMS. As such, IS-BAH Policy 2014-03, has been approved to encourage operators to reach Stage 2 and beyond, under the guidelines outlined in the IS-BAH Standard 3.2 (See IS-BAH Standards Manual, Chapter 3).   In principle, Stage 2 is considered mandatory given the requirements of IS-BAH standard 3.2. Stage 3 is not mandatory but is highly desirable and is the level all operators should endeavor to achieve.

3. Policy

3.1: At the end of their IS-BAH registration validity period Stage 1 registered operators must, at minimum, meet Stage 2 requirements as per IS-BAH standard 3.2. Once Stage 2 has been reached, ongoing improvement and a positive safety culture must be maintained. Stage 3 registration is offered to demonstrate the total immersion of SMS within an operation.

3.2: Failure to Progress

3.2.1: Operators registered at Stage 1 failing to progress to Stage 2, within 24 months following their initial Stage 1 audit, will be assigned a provisional registration at Stage 1(granted an extension). They must undergo a follow-up audit within the following 12 months, designed to lead to a Stage 2 registration. Only one provisional extension will be allowed at Stage 1.

3.2.2: Stage 2 registrants failing to sustain the continuous levels of improvement and a positive safety culture (Per IS-BAH S 3.2), evidenced at a subsequent audit within 24 months following their initial Stage 2 audit, will be assigned a provisional Stage 2 registration and must undergo a follow-up audit within the following 12 months, designed to maintain their Stage 2 status. Only one provisional extension will be allowed at Stage 2.

3.2.3: A Stage 2 registrant may wish to, and is encouraged to, stand for a Stage 3 audit within 24 months of their initial Stage 2 registration. Once achieved, a Stage 3 registrant may be granted a three year interval between audits. A Stage 3 registrant who fails to maintain the requisite maturity of their SMS, evidenced at a subsequent Stage 3 audit, will be granted a stage 2 registration, if those standards are achieved. *Suggest deleting the following.* [assigned a provisional Stage 3 registration and then be required to undergo a follow-up audit within the following 12 months, designed to maintain their Stage 3 status. Only two provisional extensions will be allowed at Stage 3.]

3.2.4: Stage 1 and Stage 2 operators failing to progress as indicated above after their provisional registration period and follow-up audit, will not hold a valid registration from the IS-BAH program. The operator may reapply for the appropriate stage of registration that had lapsed when they feel that they have corrected the major non-conformities and are ready to stand for a new registration audit. If a Stage 3 operator fails to progress as indicated above, they may be placed in the appropriate Stage level as evidenced by their

demonstrated SMS maturity. That level will be determined by the auditor and the audit review process within the IS-BAH Standard.

3.2.5: Operators who have experienced major changes in management, personnel, fleet composition, location, etc. may not feel that they are capable of progressing to the next stage. In that case they should communicate well in advance of their registration expiration date the nature of the obstacles to achieving the next audit stage to the IBAC Audit Manager. If the Audit Manager feels that there is sufficient cause to delay progress to the next audit stage he may permit the operator to be re-audited at the existing audit stage. If so, the audit manager will specify a shortened audit cycle for the next audit level.

3.3: Auditors will clearly describe the circumstances leading to a provisional registration recommendation in the audit report. They will mark the operator's current stage level as the recommended level when submitting the report for review.

Approved: Terry Yeomans, IS-BAH Program Director

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