

### 03-02-01

- 1) Unit Safety Policy
- 2) The Unit Commander will post a policy statement annually.
  - a) That statement will be included in the unit policy manual.
  - b) A signed and dated copy will be posted in a visible location in the unit office.
  - c) The policy statement will address:
    - i) The Aviation Unit will strive to lower risk to the absolute lowest level needed to conduct operations defined in this manual (Concept known as ALARP As Low As Reasonably Practicable).
    - ii) Risks that cannot be eliminated will be addressed within this safety program by all reasonable efforts to lower either, or both, the likelihood or severity of them causing an incident.
    - iii) Just Culture will be universally applied
    - iv) Management's commitment to providing a safe, healthy and secure workplace.

*The Unit Commander's Safety Policy Statement can be included here or in the first section of the unit's policy manual.*

Example:

While no operation can be completely risk free, all operations conducted at Gotham PD Aviation will be done in the safest manner possible. No mission is so important as to require deviation from safety policies, procedures, industry standards, or the prudent judgment of our aircrew. GPD Aviation management is committed to providing a safe and accident free working environment to for the health of our employees and to ensure equipment and personnel are ready to respond to calls for our services. A Safety Management System will be utilized to manage risk in support of our safety objectives. The goal of our SMS is to bring all unit employees together in order to conduct missions while keeping risk at the lowest level possible. The risk that is taken will be done so knowingly, and only when required to carry out our defined missions. Unnecessary risk will not be an accepted part of our unit. Just Culture will be applied to all aspects of the operation.

Commissioner Jim Gordon

January 1, 2015

### [03.01.01, 03.03.00]

- 3) In order to achieve the goal of reducing risks to the ALARP standard, the Aviation Unit will utilize a Safety Management System (SMS). The SMS will have the following elements:
  - a) Safety Policies and Objectives
  - b) Hazard (and Occurrence, or Incident) Identification and reporting system

- c) Management of Change procedure
  - d) Hazard and Incident Analysis procedures
  - e) Risk Analysis and Assessment functions
  - f) Risk Mitigation Strategy
  - g) Mitigation Tracking and Assurance System
  - h) Safety Education and Promotion functions (may be part of Risk Mitigation Strategy and Assurance elements) [03.05.01]
- 4) Documentation [03.02.05]
- a) To support these functions, the following will be official unit documents:
    - i. Hazard Reporting form (and/or Incident/Occurrence/Safety reports)
    - ii. Management of Change form
    - iii. Flight Risk Assessment Tool (FRAT)
    - iv. Hazard Analysis, Risk Assessment, Risk Control planning form
    - v. Just Culture chart
    - vi. Unit Risk Matrix (to be used in risk management process), with category definitions (i.e. High Likelihood = Hazard present in every flight...etc)
    - vii. Emergency Response Plan
    - viii. Safety Committee meeting agenda and minutes template
    - ix. Current SMS Goals and Objectives
    - x. Current SMS Policy Section within the unit Standard Operating Procedures Manual
  - b) The Safety Library (see below) will also contain the following records:
    - i) Collection of the minutes and meeting reports from safety meetings over the last five (5) years.
    - ii) SMS performance reports for the previous five (5) years
    - iii) Safety audit and inspection reports for the previous five (5) years
    - iv) OSHA reports, as required by the agency
    - v) Accident and Incident reports for ten (10) years

- c) Documents will be made available to unit members by the ASO, with the exception of formal disciplinary action, which will be made available according to the Unit Commander and agency policy.

### [03.02.02]

#### 5) Unit Personnel SMS Roles and Responsibilities:

- a) Unit Commander – The unit Commander is responsible for the entire SMS. In that role, the commander will:
  - i) Set unit policy
  - ii) Assign unit roles (Chief Pilot, Safety Officer, Director of Maintenance, etc.) and structure (chain of command) and selects personnel to fill those positions.
  - iii) Be part of the Safety Committee
  - iv) Publish safety goals and objectives (goals are overall, long-term items. Objectives are set for shorter intervals on more concrete things. The individual risk control goals can qualify as objectives)
- b) Chief Pilot (or Lead Instructor) – A unit member will be assigned to administrate the initial, recurrent and as-needed training for all unit members. That person will be:
  - i) Part of Safety Committee.
  - ii) Conduct training required for any risk control that is designated by the Safety Committee.
  - iii) Work directly with Safety Officer on risk control design and training.
- c) Director of Maintenance – The unit will have one person assigned to oversee all aircraft maintenance. That person will:
  - i) Be part of Safety Committee
  - ii) Work directly with Safety Officer on risk control design and maintenance related items
  - iii) Assist in hazard identification and other risk management tasks related to maintenance tasks
- d) Aviation Safety Officer (ASO) [03.02.03, 03.03.00]
  - i) The Aviation Safety Officer (ASO) will be selected by the Unit Commander (Chief Pilot, Supervisor, etc.). The selection will be based on the unit member's knowledge of unit operations and safety management. It is recommended that the ASO be an experienced pilot with at least two years experience in law enforcement flight operations.
  - ii) If the ASO has not completed formal SMS or ASO training prior to selection, they will be required to do so within the first (year, six months...) of assignment.
  - iii) After assignment, the ASO will be required to attend formal aviation safety training one (per year, two years...).
  - iv) The ASO will report directly to the Unit Commander. The ASO will also have direct access to the Director of Maintenance and the training officer (Chief Pilot, Chief Instructor).

- v) The ASO will be given written authorization to contact levels of supervision above that of the aviation unit's top supervisor. This is only to be done in extreme circumstances, when:
  - (1) Unit management has been unresponsive to a 'high risk' item, as defined by the risk assessment procedure in the unit SMS. And, the lack of response to that item is without legitimate explanation (budget, etc.). This period of 'unresponsiveness' must be beyond the strategy timeline defined by the Safety Committee (by X number of months).
  - (2) The unit manager is directly related to the cause of the problem, and attempts to talk to them about it have been unproductive.
  - (3) The unit manager is acting in a reckless and negligent manner in a way that endangers the safety of unit members.
- vi) The ASO will be responsible for setting up and/or maintaining the unit's SMS for the Unit Commander.
- vii) They will be required to collect hazard information (manage Hazard Reporting Program) and process it through the SMS as required by the Risk Management portion of the system. This includes personal observation and analysis as well as reported information.
- viii) The ASO will organize and facilitate the Safety Committee meetings. As part of this process, they will generate risk information and analysis and offer mitigation strategies to the Safety Committee.
- ix) The ASO will review and provide OSHA (or equivalent employee safety and dangerous chemical) information as required by the state of \_\_\_\_\_ (local, federal government, etc. as the case may be)
- x) Based on plans defined by the Safety Committee, the ASO will work with the training officer, unit management and other members of the unit to carry out those mitigation strategies.
- xi) The ASO will track (audit) the performance of mitigation strategies and report to the Safety Committee the results.
- xii) On an annual basis the ASO will conduct a safety audit of the entire unit. Inspections of a smaller scope will be conducted as needed in response to identified risk areas.
- xiii) The ASO will be responsible for maintaining and updating the safety library (see below).
- xiv) The ASO will be responsible for maintaining and updating a Safety Bulletin Board. The ASO will post current safety information, the status of SMS driven initiatives, hazard information and other documents as the ASO sees fit (see below).
- xv) Safety training for new employees and safety currency training for established unit members will be created, maintained and delivered by the ASO. (For details, see training section of SOP). **[03.05.01]**
- xvi) Safety meetings, stand downs and briefings will also be conducted by the ASO as required by risk management needs.
- xvii) All accident and incident reports will be reviewed by the ASO for the purpose of risk management (not discipline).

xviii) The ASO will maintain an Emergency Response Plan (ERP) and coordinate a drill for the ERP at least once per year.

[03-02-03 (2)]

- e) The Safety Committee will be composed of: the ASO, at least one member of management, someone in charge of training, a representative from maintenance, and at least one representative of each line level job classification (*pilot, TFO, medic, etc.*)
  - i) The Safety Committee will meet at least once a quarter.
  - ii) The Safety Committee will review all hazard and risk information from the ASO, consider the mitigation strategies and discuss how to best address each issue. The Safety Committee will assign tasks and follow up dates to each task, as appropriate. [03.03.01(c)]
  - iii) The Safety Committee will also review any incidents that have occurred.
  - iv) The Safety Committee has the authority to change policy/procedures, and to implement or change training.
  - v) The Safety Committee may make recommendations on budget items and disciplinary follow up, per the unit Just Culture policy. Final decisions on those items will remain the responsibility of the Unit Commander.
  - vi) The ASO will prepare a written agenda for each meeting. Following each Safety Committee meeting, the ASO will write a report on the findings of the committee and proposed actions. This report will be made available to all unit members.
  - vii) In cases of units with large numbers of employees, there will be one Safety manager assigned to the unit and several Safety Officers (Representatives, etc.) assigned to each (shift, work area, site, etc.). Responsibilities and authority for each must be divided up and codified in policy as appropriate for the unit.
- f) Other unit personnel
  - i) Responsible for reporting hazards
  - ii) Required to participate in SMS surveys, audits and inspections
  - iii) Utilize risk controls as applicable to their position
  - iv) Provide feedback, as requested, for risk assurance (performance tracking) purposes
  - v) Participate in Safety Committee as required

[03-02-04]

VII Emergency Response Planning

- 6) The ASO will establish and/or maintain an Emergency Response Plan (ERP). The ERP will be a written document and maintained:
  - a) Hard copy in the communications center, Watch Commander's Office and Aviation Unit Office(s)
  - b) Digital copies will be made available through the agency's intranet or digital document drive to facilitate remote access.
  - c) The ERP will have sections for:
    - i) Locating missing aircraft

- ii) Contact information for support fire, SAR assistance, air traffic control, and other groups that may be required
  - iii) Searching for missing aircraft
  - iv) Responding to an accident site
  - v) Caring for unit member's families
  - vi) Investigating an accident
  - vii) Recovering the aircraft
  - viii) Public Affairs (Media) Officer guidance
  - ix) Post-incident safety review and stand-down procedures
  - d) The ERP will include an accident investigation kit to be used when responding to a scene, including:
    - i) Investigation materials
    - ii) Statement forms
    - iii) Fuel collection canisters
    - iv) Equipment for securing the aircraft for investigation and recovery
  - e) All unit members will receive initial training on the ERP.
  - f) The ASO will coordinate a drill for the ERP at least once per year.
- 7) Scheduled Tasks. The ASO will complete or coordinate the following tasks on a regular basis:
- a) Safety Survey (2x/year)
  - b) Internal Safety Audit (annually)
  - c) Safety Committee Meeting (4x/year)
  - d) Safety Committee Meeting and SMS Performance Summary report (4x/year)
  - e) Safety Assurance Audit (annually) *overview of entire SMS performance*  
[03.04.01 (3)] [03.04.03]
  - f) Bulletin Board Update (monthly)
  - g) Have the unit manager re-sign the safety statement (annually)
  - h) ERP Drill (annually)
  - i) External Safety Audit (1x/3 years) [03.02.04, 03.04.01(b)]
  - j) Safety Currency Training for unit members (2x/year minimum)
  - k) Attend formal safety training (annually)
  - l) OSHA required inspections (as required)
  - m) Safety Inspections (fire extinguishers, survival vests, PPE, mechanical guards on tools, etc.) (4x/year) [03.04.01 (4)]
  - n) Inspections of contractor facilities, procedures (as required) [03.04.01 (5)]

*To be written into the unit SOP training section and/or into the safety section:*

- 1) Initial Employee Training – All employees will receive initial training on the unit's SMS within 30 days of assignment to the unit. This training will include explaining to the employee what an SMS is, their role in the SMS and how to interact with the system, i.e. making hazard reports, participating in safety training, reporting tracking and assurance items. The training will also cover the



- 9) Risk Mitigation [03.03.02]
- a) The ASO will formulate possible risk control strategies for those items deemed medium to high risk.
  - b) The information formulated in the Hazard Analysis and Tracking forms, along with suggested Mitigation Strategies will be compiled into agenda items for the Safety Committee Meeting.
  - c) The Safety Committee will review the information in the agenda to:
    - i) Make a final determination on Risk Analysis.
    - ii) Determine which risks score high enough to warrant action.
    - iii) Identify additional hazard items/contributing factors.
    - iv) Discuss possible mitigation strategies (including suggestions from the ASO).
    - v) Discuss discipline recommendations when applicable.
    - vi) Make a final determination on follow up action (training, purchasing equipment, obtaining more information, policy/procedure change, etc.).
    - vii) Assign action items and follow up dates for selected mitigation strategies
    - viii) If the committee recommends a change in policy, procedure, training, equipment, or any other significant change, the Management of Change Form will be used to manage any hazards that may be created by the proposed mitigation strategy. [03.04.02]

*It is recommended that the requirement to use a formal Management of Change process be written into the unit's SOP in the first section of the manual (such as the Administrative Section). This strengthens the idea that risk management is a part of all changes in the unit. Something such as, "all changes made to this policy manual or any operational procedure will require the use of a Management of Change form and review by the Safety Committee."*

- d) The ASO will:
    - i) Determine a means of tracking each mitigation strategy in order to monitor performance.
    - ii) Enter the mitigation strategy, tracking information, and target dates in the Hazard Tracking Form.
    - iii) Assist anyone tasked with implementing a mitigation strategy as required. The training officer and ASO will work together on any training aspect of mitigation planning [03.05.01 (1)]
    - iv) Make Return on Investment or Probability of Success calculations as required.
- 10) SMS Program Performance Assurance [03.04.01]
- a) The ASO will continually monitor all active risk control strategies as required by each one.
  - b) At predetermined dates listed for each mitigation strategy, the ASO will evaluate how each risk control is performing. This information will be tracked in the Hazard Tracking Form.

- c) During Safety Committee meetings, the ASO will provide the committee with the performance status of each hazard currently tracked in the Hazard Tracking Form.
  - d) The ASO will perform an annual safety audit of the unit. [03.04.03]
    - i) This audit should include a review of all of the mitigation performance information on the Hazard Tracking Form. It should also include overall changes in risk, return on investment, etc.
    - ii) Additional unit members may be utilized to audit specific areas of the operation.
    - iii) This audit will also include the results of regular safety inspections (PPE, safety equipment, etc.)
    - iv) It will review the safety objectives and goals, and the unit's progress towards them.
    - v) A survey should be included in order to identify new hazards and gauge the safety culture at the operation (belief in Just Culture, participation in hazard reporting, personal assessment of risk, etc.). This survey should be compared to previous survey results.
    - vi) The report will include recommended changes based on audit results.
    - vii) A report will be written and made available to all unit members.
  - e) At least once every three years the unit will have an outside source perform a safety audit of the program.
- 11) Safety Communications [03.05.02]
- a) The ASO will maintain a safety library. The library can be traditional print, electronic, or a combination of both. The safety library should include training and safety related materials in addition to:
    - i) Previous required safety readings (safety reading file)
    - ii) Safety Committee meeting minutes
    - iii) SMS annual reports, audits and inspections
    - iv) Occurrence (accident/incident) reviews
  - b) There will also be a safety bulletin board. The board will be posted in a common area within the unit's office(s). The material on the board should be updated monthly. Items on the board should include:
    - i) Current list of hazards that are being addressed through the SMS (i.e. the Hazard Tracking form, etc.)
    - ii) Current aviation incidents and accidents
    - iii) Aviation safety documents and short articles
    - iv) Emergency procedures that should be periodically reviewed (i.e.: Emergency Procedure of the day/week/month)
- 12) If required, the ASO will also maintain the required OSHA documents.

Crew rest policy? [02.01.05]

Weather limitations [02.02.02, 02.03.02]