

SELAIR PILOTS' ASSOCIATION



Safety Management Manual

Effective: Sept. 1, 2009

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Amendments

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1. Safety Management Plan

1.1 Safety Policy

Safety is a core value within our operation. As a training facility it is our responsibility to instil a safety conscious attitude among the young pilots we influence. This attitude will carry on with our students as they enter the workforce, and in this way our safety culture is an important foundation for the rest of the aviation industry. We must strive to make continuous safety improvements and excellence an integral part of all our activities.

All personnel are responsible and accountable for their actions and safety performance, starting with myself as accountable executive. I endorse all personnel to think and work safely at all times, regardless of any real or perceived pressures to do otherwise.

Selair's policy is to apply a Safety Management Systems approach to all activities in order to prevent accidents, to eliminate damage to equipment and property, to eliminate injury to personnel and to work diligently towards reducing safety incidents and hazards.

It is Selair's policy to comply with all applicable laws and regulations regarding safety in the workplace. Selair supports the best aviation industry practices regarding safety and intends to provide all its members with a safe and healthy working environment.

Mike Dion
Accountable Executive

Date

1.2 Non-Punitive Safety Reporting Policy

Safety is to be considered above all other factors in all company risk management processes. Only with full awareness can management rectify deficiencies in a timely manner.

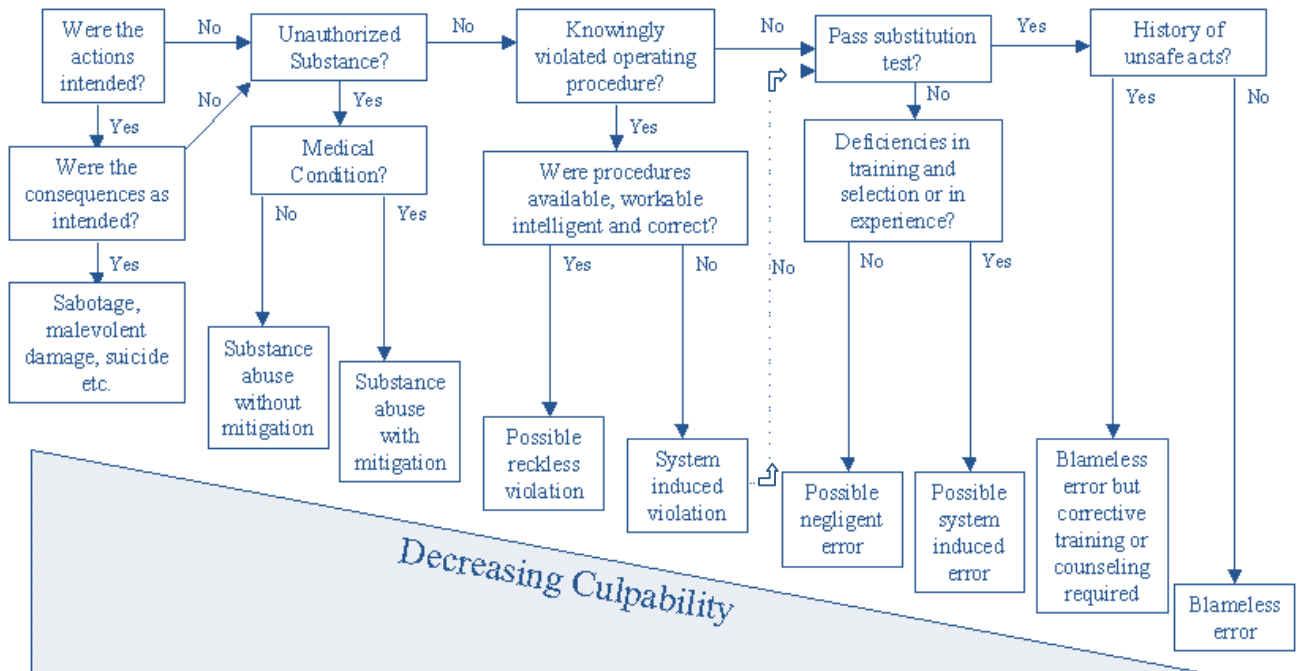
Personnel at all levels are required to take preventative safety action, and to immediately inform their supervisor if they are aware of any immediate safety threat to themselves or others. All personnel are required to report accidents, incidents or safety hazards in accordance with the prescribed reporting procedures. No disciplinary action shall be taken against any personnel who act to prevent an injury or reports any accident, incident or hazard.

All personnel are required to adopt the standards and procedures set forth in the Safety Management Program. Failure to comply with this safety policy by any personnel at any level will result in disciplinary action.

The only other cases where disciplinary action will be taken are for:

- negligence;
- wilful or intentional disregard;
- criminal intent;
- falsification or misrepresentation; and
- use of illicit substances.

When assessing personnel behaviour the following “Just Culture” model will be applied:



From Reason (1997) A decision tree for determining the culpability of unsafe acts. p.209
Reprinted by permission from the Global Aviation Information Network

Note: The model is quite straightforward with the exception of the box entitled “Pass substitution test?”.

Substitution test: could a different person (well motivated, equally competent, and comparably qualified) have made the same error under similar circumstances:

Yes: the person who made the error is probably blameless.

No: were there system-induced reasons (such as insufficient training, selection, experience)?
If not, then negligent behaviour should be considered.

1.3 Roles and Responsibilities

We ensure that all SMS roles and responsibilities as well as personnel involvement are identified, communicated, documented, and periodically evaluated to ensure they are appropriate and functioning within all levels of the organization.

In addition to safety responsibilities associated with our daily operations, the Accountable Executive, SMS Manager, and personnel have additional responsibilities associated with the operation and maintenance of our SMS.

Accountable Executive

The accountable executive is responsible for:

- establishing and implementing the SMS;
- ensuring the required safety resources are available;
- establishing and adhering to the safety policy;
- promoting and supporting SMS; and
- ensuring the SMS remains effective.

SMS Manager

The SMS manager is responsible for:

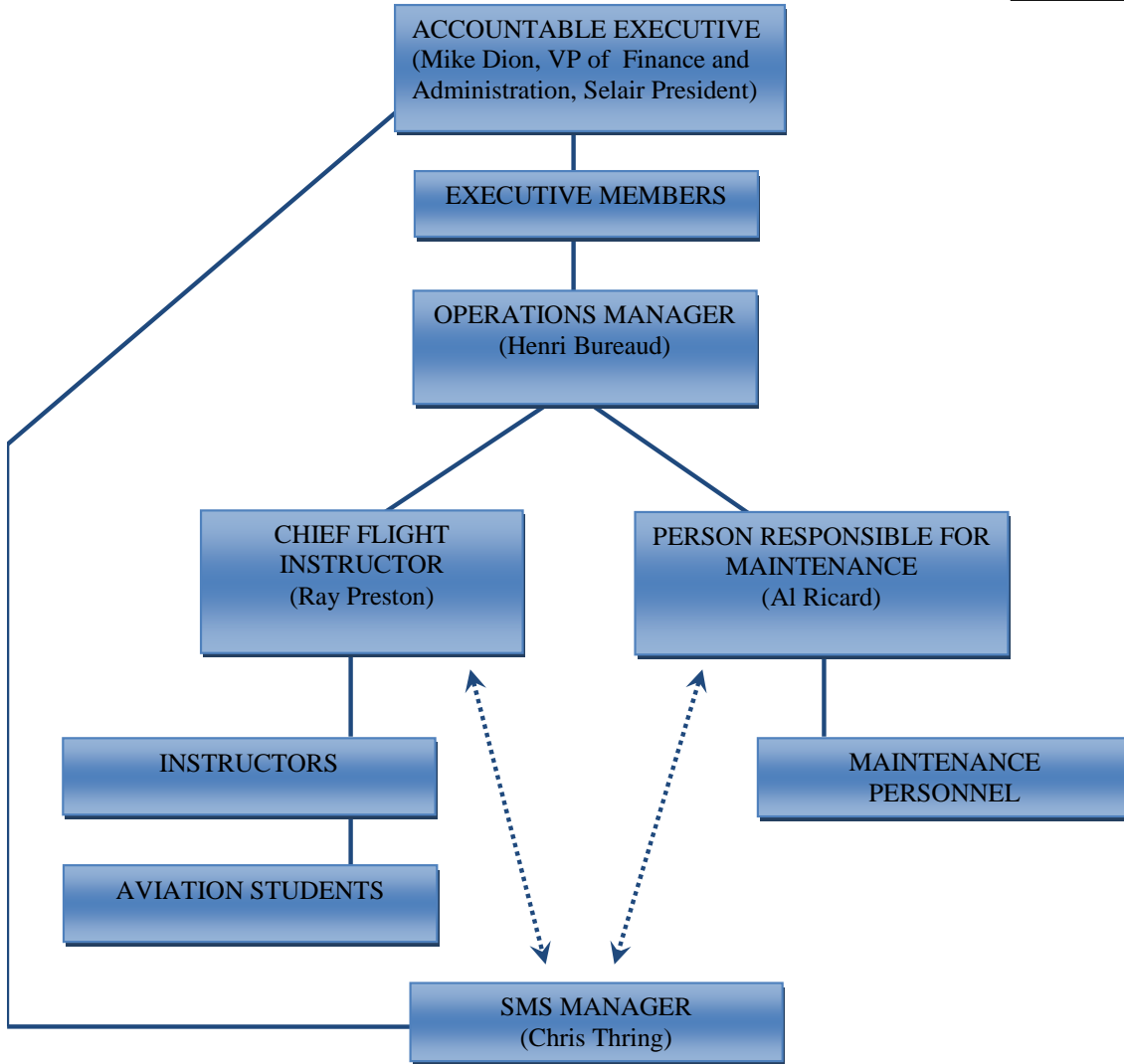
- managing the operation of the SMS;
- collecting and analyzing safety information;
- monitoring and evaluating the results of corrective actions;
- ensuring that risk assessments are conducted when applicable;
- determining the adequacy of training;
- authority to delegate specific SMS tasks/roles to persons within the organization;
- ensuring that periodic reviews of the system are conducted;
- monitoring the industry for safety concerns that could affect the program;
- ensuring safety-related information, including organization goals and objectives, are made available to all personnel through established communication processes; and
- communicating any operational concerns which have been identified to the Chief Flight Instructor and/or the Person Responsible for Maintenance as applicable.

Personnel

Personnel are responsible for:

- following established safe practices;
- immediately dealing with any unsafe condition;
- identifying and reporting all occurrences, hazards, operational irregularities, unsafe conditions or practices in a timely manner; and
- being familiar with the SMS.

1.3a Organizational Chart



NOTES: The Accountable Executive will delegate authority for expenditures up to and including a predetermined and mutually agreed upon amount to the Operations Manager. In this way the Ops Manager will be able to authorize routine operational expenditures. Any amount over the predetermined limit requires a signature from the Accountable Executive.

The Accountable Executive must be the President of Selair. This ensures full control over financial resources.

The Ops Manager must be a Selair executive member and an aviation program pilot. This ensures a familiarity and strong understanding of the unique requirements and responsibilities of an aviation organization.

1.4 Communication

To facilitate the operation, maintenance and effectiveness of our SMS, we will communicate, share, and review safety related information through meetings and electronic and written documentation with the following:

- Internal:
 - at least semiannual safety meetings to review reports;
 - face-to-face on an individual or group basis;
 - organization memos;
 - safety bulletin board; and
 - amendments to documentation.
- External:
 - participation in relevant and accessible safety-related forums;
 - other organizations and associations; and
 - manufacturers.

1.5 Safety Planning

The aim of establishing attainable objectives and goals is to ensure the effectiveness and continuous improvement of safety. Annually, objectives and goals will be reviewed and updated in accordance with our performance measurement and management review processes. These reviews will also confirm that the objectives and goals are linked. The process for establishing goals includes review of the following:

- results of internal audits; and
- occurrence and hazard reports.

Our current objectives and goals are:

- Objective A: Reduce hazards and associated risks.
 - Goal 1: Increase the number of hazard reports received.
 - Goal 2: Increase the number of occurrence reports received.
- Objective B: Continue to enhance trend monitoring and the development of effective corrective action plans.
 - Goal 1: Provide trend monitoring and cause analysis training to SMS manager.

1.6/1.7 Performance Measurement and Management Review

An annual management review will serve to analyze data gathered during the quality assurance audit, hazard and occurrence reporting, and trend monitoring to assess the SMS effectiveness and verify continuous improvement.

Components of the process include:

- identifying trends through data analysis and information sharing;
- evaluating effectiveness of corrective actions;
- communicating results with personnel;
- updating safety objectives and goals;
- monitoring and updating safety performance measures;
- allowing for risk-based allocation of resources;
- reviewing quality issues; and
- reviewing the Emergency Response Plan.

Our safety performance measures for this year are:

- number of hazards identified this year vs. previous years;
- number of occurrence reports received this year vs. previous years;
- number of incident and accident reports received this year vs. previous years;
- provision of SMS training to personnel;
- reduction in damage to Selair and College property this year vs. previous years.

2. Documentation

2.1 Identification and Maintenance of Applicable Regulations

The purpose of identifying and maintaining applicable regulations is to ensure that we understand our legal responsibilities. The SMS manager will ensure the following process is followed:

- utilize the applicable regulations maintenance form in the appendix to conduct a bi-annual review of CARs and Standards, including applicable exemptions, and act upon change as appropriate; and
- ensure the pertinent regulatory and technical information is available to all personnel through their applicable departments.

2.2/2.3 SMS Documentation and Records Management

By documenting and managing associated records we ensure all personnel remain informed and involved with our SMS. The SMS manager maintains the following documents and records:

- the Safety Management Manual which describes the policies, processes, and procedures; and
- records from these processes.

The following documents are kept in a location easily accessible by all personnel and are updated as required:

- Safety Management Manual (SMM);
- Maintenance Control Manual (MCM);
- Flight Operations Manual (FOM); and
- Standard Operating Procedures (SOPs).

Records and information gathered through the SMS will be stored in a secure filing cabinet and kept on file for a minimum of two years.

The SMM will be available to all personnel in both electronic and paper format (one paper copy in the dispatch area). Information in the SMM is reviewed during the annual quality assurance audit, and on an as-required basis.

3. Safety Oversight

3.1 Definitions

Accident:

Any occurrence that takes place in the course of an organization's operations that results in:

- death;
- injury requiring medical treatment or causing lost time from work; or
- substantial physical damage to equipment, facilities or property.

Incident:

An occurrence with potential to be an accident but which, through chance or actions taken by those involved, does not result in an accident.

Hazard:

An event, condition, or circumstance that, left uncorrected or unchanged, could result in an accident or incident.

3.2 Reactive/Proactive Processes - Reporting

As part of our safety management system we maintain an occurrence/hazard reporting system to collect and analyze data and carry out investigations. Continuous safety improvement requires accurate, complete, and timely reporting of all occurrences and identified hazards within our organization. All reports will be dealt with in confidence. Self-identified reporters will receive a response acknowledging their submission within 7 days, and an update within 30 days or upon process completion.

When an occurrence (incident or accident) happens, or a hazard is identified it must be documented by submitting the occurrence/hazard report form located in the appendix of this manual. Alternatively the report may be submitted electronically via the Safety page on the Professional Pilot website.

When an occurrence happens or a hazard is identified the process is as follows:

- The reporter completes the occurrence/hazard report form and submits it to the SMS manager.
- The SMS Manager acknowledges the submission, and completes the occurrence/hazard analysis form.
- The SMS Manager leads the investigation and development of corrective actions, including follow up and the determination of the requirement to carry out a risk assessment.
 - A risk assessment is required when:

- trend analysis shows that previous corrective actions have not resolved similar concerns;
 - it is not clear what the root cause is;
 - the issue is complex;
 - the potential loss is severe; or
 - the SMS Manager or other personnel feel it is necessary.
- Relevant documentation will be filed and saved for a minimum of two years.
 - This information will be used as part of the performance measurement and management review process.

3.3 Investigation and Analysis

Investigation and analysis are components of the reactive, proactive and risk-management processes. Details can be found in those sections.

The SMS Manager will lead the investigation and analysis of occurrences and hazards to:

- determine the cause;
- develop and implement corrective or preventative actions; and
- evaluate corrective actions to make sure they are effective.

3.4 Risk Management

If it is determined that a risk assessment is required, the SMS Manager will conduct and document the process by completing the risk management worksheet located in the appendix.

The risk management process is as follows:

- the hazard or occurrence is identified;
- the associated risks are determined;
- the probability or severity risk rating is determined;
- risk control strategies are implemented;
- implemented risk control strategies are assessed;
- when the process has been completed the SMS file is updated with a narrative of the results; and
- the completed forms will be filed and saved for a minimum of two years.
- This information will be used as part of the performance measurement and management review process.

4. Training

4.1 Training, Awareness and Competence

All personnel are qualified in accordance with applicable CARs training requirements. In order to meet additional SMS training requirements we have implemented the following:

- Initial SMS training:
 - The SMS Manager will provide all organization personnel with an initial training session on the SMS.
- Recurrent SMS training:
 - When regulatory changes have been identified, such changes will be reviewed and incorporated, if applicable, and the SMS program will be updated as required;
 - Once each year, or as required, all personnel will receive recurrent training to include:
 - information on changes to SMS; and
 - a review of all pertinent reported occurrences and hazards including recommended mitigations and corrective or preventative actions.
- SMS training validation/performance measurement:
 - Assessment of the overall effectiveness of training shall be determined by:
 - the SMS Manager evaluating the level of learning through verbal or written quizzes; and
 - any internal audit finding that identifies additional training in the corrective action plan.
- Additional SMS training:
 - where it is shown to be necessary by findings identified during the internal quality assurance audit, additional training will be undertaken; and
 - when any new requirement arises.
- Emergency preparedness and response training:
 - the SMS Manager will ensure that all personnel are trained in, and aware of, their duties and responsibilities within the Emergency Response Plan.
- Training records:
 - A record of all training completed will be kept in personnel files.

5. Quality Assurance

5.1 Operational Quality Assurance

As a condition of the existing air operator (FTU) and approved maintenance organization (AMO) certificates, we meet applicable CARs Parts IV and V, QA Program requirements. In order to meet additional SMS QA requirements, we have implemented the following:

- Existing independent audit procedures will continue to be followed; and
- an SMS audit will be conducted annually by personnel assigned by the SMS Manager.
- The SMS audit checklist is included as part of the appendix and will include:
 - safety policy;
 - non-punitive reporting policy;
 - roles, responsibilities and personnel involvement;
 - communications;
 - safety planning objectives and goals;
 - performance measurement and management review;
 - identification and maintenance of applicable regulations;
 - SMS documentation and records management;
 - reactive and proactive processes, investigation and analysis;
 - emergency preparedness and response; and
 - review of safety critical functions.
- Audit findings will be included as part of the management review.
- Additional SMS audit training will be provided as required.

6. Emergency Preparedness

6.1 Emergency Preparedness and Response

The Selair Pilots' Association recognizes that even the safest operations can suffer loss. In order to reduce human suffering and property damage after an accident or serious incident has occurred, we have developed an Emergency Response Plan (ERP). This plan is included as part of this section. The plan outlines basic procedures necessary to activate a response that is expeditious, orderly and appropriate for the occurrence. It also provides direction on follow-up activities that may be required.

The SMS Manager is responsible for the maintenance and distribution of this plan. All personnel are expected to be aware of their role in this plan and to act accordingly.

The ERP is:

- periodically examined as part of the management review;
- communicated and distributed to all personnel and local emergency response authorities;
- exercised in co-operation with local authorities on an as needed basis;
- updated as required; and
- a required training item for all personnel who may be involved in the event of an emergency.

These instructions, along with the Emergency Report Form and Telephone Number List found in the appendix of this manual, will be used at all company bases of operation. They will be posted in clear view near a telephone, communications radio etc. that is likely to be used to report an emergency.

6.2 Immediate Procedures

6.2.1 General

1. For operational emergencies use the **Emergency Report Form** and **Telephone Number List** found in the appendix of this manual.
2. If all information is not available **DO NOT** delay action while it is being gathered.
3. Unless **ABSOLUTE** knowledge to the contrary exists, assume all persons on board:
 - have survived; and
 - are injured.
4. Report by the **FASTEST** means available.
5. If at all possible, report by the most **PRIVATE** means. Think of the consequences to the victims and their families. If you have to use a radio, provide only as much specific information as is absolutely necessary to ensure a rapid response to the emergency (i.e. do not give names etc.).
6. **DO NOT** make statements to the **MEDIA**. Once again consider the victims and their families. Direct all media inquiries to the Media Relations Spokesperson. If pressed, state “Sorry I am not authorized to comment, please contact Barry Auliffe at 250 505-1384. Thank you.”
7. **REMEMBER:**
 - Keep calm - panic or undue haste can cost lives.
 - Act in a responsible, professional manner.
8. Keep communication lines clear for emergency purposes only.
9. Keep **NOTES** on all communications, observations and actions.

6.2.2 Personnel Reporting

Personnel shall report any **aircraft accident, overdue aircraft, unlawful interference** or **aircraft bomb threat IMMEDIATELY** to the first person that can be reached in the following order:

- Dispatcher;
- Chief Flight Instructor;
- Department Instructor;
- Person Responsible for Maintenance; or
- The Chair of Business and Aviation.

This person will become the Emergency Response Manager for the purposes of handling the occurrence. If the Dispatcher is the first person made aware of the occurrence they should immediately make contact with another person from the list. If no one else is available the Dispatcher will remain the Emergency Response Manager.

6.2.3 Dispatch Procedures

When notified of any occurrence, the Dispatcher shall be considered the “Emergency Response Manager” for the purpose of these procedures.

OVERDUE AIRCRAFT (30 MINUTES AFTER ETA)

The **Emergency Response Manager** shall:

1. Review the Flight Itinerary.
2. Begin a communications search. Record the name of each agency, the name of the person spoken to, times attempted, time completed and results. Indicate in the last column if, in your judgement, this contact is not required.

Agency	Person Contacted	Time Attempted	Time Completed	Not required
Air Traffic Services Unit				<input type="checkbox"/>
Notes:				
“responsible person” as indicated in a flight itinerary				<input type="checkbox"/>
Notes:				
				<input type="checkbox"/>
Notes:				
				<input type="checkbox"/>
Notes:				

3. Contact the first person that can be reached in the following order :
 - Chief Flight Instructor;
 - Department Instructor;
 - Person Responsible for Maintenance; or
 - The Chair of Business and Aviation.
4. Once contact has been established with one of the aforementioned people they will become the “Emergency Response Manager.” If unable to contact someone from the list the Dispatcher will remain the “Emergency Response Manager”.

OVERDUE AIRCRAFT (60 MINUTES AFTER ETA)

The **Emergency Response Manager** shall:

1. Continue the communications search commenced in the OVERDUE AIRCRAFT (30 MINUTES AFTER ETA) section.
2. Inform the following agencies of the overdue aircraft. Record the name of the person spoken to, times attempted, time completed and any relevant notes. Check the last column if, in your judgement this contact is not required.

Agency	Person Contacted	Time Attempted	Time Completed	Not required
Rescue Co-ordination Centre				<input type="checkbox"/>
Notes:				
Chief Flight Instructor				<input type="checkbox"/>
SMS Manager				<input type="checkbox"/>
Media Relations Spokesperson				<input type="checkbox"/>

3. Contact the first person that can be reached in the following order:
 - Chief Flight Instructor;
 - Department Instructor;
 - Person Responsible for Maintenance; or
 - The Chair of Business and Aviation.
4. Once contact has been established with one of the aforementioned people they will become the “Emergency Response Manager.” If unable to contact someone from the list the Dispatcher will remain the “Emergency Response Manager”.

AIRCRAFT ACCIDENT, UNLAWFUL INTERFERENCE OR BOMB THREAT

The **Emergency Response Manager** shall:

1. In the case of a bomb threat that is received from a source other than the aircraft involved, ensure that the pilot-in-command is aware of the threat.
2. Organize necessary assistance.
3. Inform the following agencies of the emergency. Record the contact and place a check in the last column if, in your judgement, this contact is not required.

Agency	Person Contacted	Time Attempted	Time Completed	Not required
Air Traffic Services Unit				<input type="checkbox"/>
Result:				
Police				<input type="checkbox"/>
Result:				
Fire				<input type="checkbox"/>
Result:				
Ambulance				<input type="checkbox"/>
Result:				
SMS Manager				<input type="checkbox"/>
Media Relations Spokesperson				
Transportation Safety Board				<input type="checkbox"/>
Result:				
Insurance Company (See 6.3.6)				<input type="checkbox"/>
Result:				

4. Contact the first person that can be reached in the following order :
 - Chief Flight Instructor;
 - Department Instructor;
 - Person Responsible for Maintenance; or
 - The Chair of Business and Aviation.
5. Once contact has been established with one of the aforementioned people they will become the “Emergency Response Manager.” If unable to contact someone from the list the Dispatcher will remain the “Emergency Response Manager”.

Note: When in doubt as to the need to report an occurrence to the Transportation Safety Board, the Emergency Response Manager shall contact the Board for clarification.

NON-OPERATIONAL FIRE, BOMB THREAT, CRIMINAL ACT, CIVIL EMERGENCY

The **Emergency Response Manager** shall:

1. If it is necessary to evacuate the Dispatch Office, relocate operations to a safe location taking:
 - a. all active flight watch documents
 - b. portable backup radio equipment
 - c. a cellular telephone (after forwarding the Dispatch phone line to it)
2. Inform the following agencies of the emergency. Record the contact and place a check in the last column if, in your judgement, this contact is not required.

Agency	Person Contacted	Time Attempted	Time Completed	Not required
Air Traffic Services Unit				<input type="checkbox"/>
Result:				
Police				<input type="checkbox"/>
Result:				
Fire				<input type="checkbox"/>
Result:				
Ambulance				<input type="checkbox"/>
Result:				
SMS Manager				<input type="checkbox"/>
Media Relations Spokesperson				<input type="checkbox"/>
Transportation Safety Board				<input type="checkbox"/>
Result:				
Insurance Company (See 6.3.6)				<input type="checkbox"/>
Result:				

3. Contact the first person that can be reached in the following order:
 - Chief Flight Instructor;
 - Department Instructor;
 - Person Responsible for Maintenance; or
 - The Chair of Business and Aviation.
4. Once contact has been established with one of the aforementioned people they will become the “Emergency Response Manager.” If unable to contact someone from the list the Dispatcher will remain the “Emergency Response Manager.”

Note: When in doubt as to the need to report an occurrence to the Transportation Safety Board, the Emergency Response Manager shall contact the Board for clarification.

6.2.4 Notification of Next of Kin

It is not appropriate for Selair or its personnel to notify next of kin. Police authorities, often with the support of trained counsellors, perform this task.

It may be known that certain people were involved in a particular occurrence and that it is likely that there are fatalities. In such circumstances, *factual information only* regarding injuries or fatalities may be given in response to direct requests from members of the victim's immediate family. Confirm the identity of the person making the enquiry to ensure sensitive information is not inadvertently given to the media.

It is imperative that no such information be given unless it is confirmed, factual information. Such information should be given in person. This information may not be given by telephone unless there are extraordinary circumstances.

6.3 Follow-up Procedures

6.3.1 Passenger and Crew Welfare

Following an emergency, considerable sensitivity is required in ensuring the welfare of passengers, crew and any other affected people. Selair recognizes that accidents can be very traumatic for those involved. Selair personnel shall ensure that everyone involved is treated with the utmost consideration.

Ensure that everyone involved receives appropriate medical attention. Following any accident, all involved persons should be seen by a qualified medical practitioner, even if there are no apparent injuries or if injuries appear to be minor. If someone is reluctant to receive medical attention, do your best to persuade him or her to see a doctor or go to hospital. Make a written note of anyone who refuses to receive medical attention.

Following an operational emergency:

1. Wherever practical, crewmembers should be separated from passengers and their loved ones. Remind crewmembers not to discuss the occurrence with the media.
2. **DO NOT** ask passengers or crewmembers to discuss the events or provide accounts, descriptions or opinions of the accident. **DO NOT** offer excuses for, explanations of, or opinions about the accident or its probable causes.

6.3.2 TSB Liaison

The SMS Manager and/or the Chief Flight Instructor shall request permission from the TSB to appoint a company observer to participate in any TSB investigation of an accident or incident involving the company's operations.

The company observer shall provide all necessary liaisons between Selair and the TSB and keep the SMS Manager informed on the status of the TSB investigation.

6.3.3 Preservation of Evidence

Selair personnel shall immediately secure relevant records pertaining to the personnel, passengers, aircraft, equipment or facilities. Such records shall be packaged and kept in a secure location until requested or released by the investigating agency or internal investigation team.

Dispatch

The Dispatcher shall secure the originals of all documents and copies or printouts of all electronic data relevant to the accident. This material shall include all briefing materials, weather information, pre-flight calculations, navigation logs, etc.

Flight Operations

The Chief Flight Instructor shall secure all documents related to the flight crews — licensing and qualifications, training records, medical status. In addition she/he shall secure copies of any other documents related to the aircraft and its crew. A complete copy of the Operations Manual as it was at the time of the accident shall be included.

Maintenance

The Person Responsible for Maintenance shall secure all records related to the maintenance, ground handling or fuelling of the aircraft.

6.3.4 Accident Investigation

In situations where the TSB, coroner, police or other civil authority are investigating an accident, Selair personnel shall not attend the scene for purposes of investigating without the expressed permission of the agency that is conducting the investigation.

The SMS Manager is responsible for the appointment of company personnel to participate in TSB investigations. In situations where the TSB chooses not to investigate, the SMS Manager may appoint a team of internal personnel or consultants to conduct such investigations.

Team Response to Accident Site

Upon deployment to an accident site the investigation team shall:

- In the event that the site has not been secured, contract with a local security agency for site security.
- Neutralize any remaining hazards including dangerous goods and biological hazards.
- Collect physical evidence, recording the date, time, location and other significant data for each item collected.
- Take detailed measurements.
- Take photos or make sketches. Record the overall scene, specific damage and the positions of relevant indicators, switches and controls.

6.3.5 Wreckage Management

The SMS Manager shall arrange with a local security agency for site security in the event that the site has not been secured by some other agency as part of their investigation.

The SMS Manager shall co-ordinate with the Insurance Company (See 6.3.6) for the removal of aircraft wreckage to a secure site for disposal or repair.

6.3.6 Insurance Procedures

1. The SMS Manager shall be responsible for any continuing liaison that may be required with respect to operational or technical matters related to the accident. Where appropriate, this responsibility may be transferred to another Department Instructor.
2. The **Emergency Response Manager** shall provide the President with a copy of all information given to the insurance company.
3. The President shall be responsible for conducting all financial dealings with the insurer.

Aon Reed Stenhouse Inc.	
Initial Reports (24 Hours)	Phone: 604-688-4442 Fax: 604-682-4026
Follow-up liaison:	Wayne Skerlyk 604-943-7063
Insurance policy no.:	400AC-52050

6.4 Media Relations

6.4.1 Personnel

Individuals who are not specifically designated by Selair shall not discuss any accident or incident with the media at any time. All media calls shall be directed to the Media Relations Spokesperson listed in the Telephone Numbers Form in the appendix of this manual. If the Media Relations Spokesperson cannot be reached, contact information for the Chief Flight Instructor shall be provided.

Suggested format for this referral:

“I am not able to speak on behalf of Selair on this matter. Barry Auliffe, our Media Relations Officer, can be reached at 250-505-1384 or 250-505-4658”.

Expect media representatives to be persistent and pressing. **DO NOT** engage in any discussion of the occurrence. **Simply repeat the preceding statement as often as necessary.**

6.5 Plan Administration

6.5.1 Maintenance

The SMS Manager shall:

- Ensure that the plan is reviewed and verified:
 - at least annually;
 - whenever contact information has changed; or
 - whenever occurrence reporting procedures are altered.

6.5.2 Training

The SMS Manager is responsible for:

- Ensuring that all personnel receive training of the content of the ERP and their responsibilities under it.
- Providing initial training and annual recurrent training.

6.5.3 Testing

The SMS Manager is responsible for periodically conducting and evaluating tests of the ERP and for making changes or amendments as required to ensure its effectiveness.

