NAMIBIAN CIVIL AVIATION AUTHORITY

Advisory Pamphlet (AP)

FSS-SPQ-AP140-02
1/1/2/4/1-2

SAFETY MANAGEMENT SYSTEMS (SMS) AND OCCURENCE REPORTING

03/2022

Advisory Pamphlets (AP) system.

1. The Namibian Civil Aviation Authority (NCAA) issues advisory pamphlets in accordance with NAMCARs 2001, Part 3, regulation 3.04.4 to inform the aviation public in a systematic way of non-regulatory material. Unless incorporated into a regulation by reference, the contents of an advisory circular are not binding on the public. Advisory pamphlets are issued in a numbered-subject system corresponding to the subject areas of the Namibian Civil Aviation Regulations (NAMCARs).

2. Advisory Pamphlets are intended to provide information and guidance to illustrate a means but not necessarily the only means of complying with the Regulations, or to explain certain Regulatory requirements by providing interpretative and explanatory material. Where an AP is referred to in a 'Note' below the regulation, the AP remains as guidance material.

3. APs should always be read in conjunction with the referenced regulations.

4. Safety Management Systems and Occurrence Reporting is set out in the Schedule attached hereto.

5. Advisory pamphlets may be reproduced in their entirety or in part without permission from the Civil Aviation Authority. Advisory pamphlets may also be accessed at https://www.ncaa.com.na .

Effective date: 10th March 2022

NAMIBIA CIVIL AVIATION AUTHORITY NCAA 03 MAR 2022

03/03/2022

Ericsson M. Nengola
Interim Executive Director of Civil Aviation

Contents

SCHEDULE

1. INTRODUCTION

This advisory pamphlet provides guidance material to Operators and Organization for establishing, implementing, and maintaining an SMS system and the management of occurrence reporting.

2. BACKGROUND

All aviation organisations and operators, from airline operators to aviation recreational organisations, aircraft maintenance organisations to aerodrome operators, are required under Namibian Civil Aviation Regulation Part 140 to establish, implement, and maintain a Safety Management System (SMS). This document is created to assist operators and organisations in creating and managing an effective Safety Management System.

3. REFERENCES

The following documents have been referenced in creating this advisory pamphlet. Those responsible for establishing and implementing SMS should become familiar with these documents:

a) NAMCAR and NAMCATS Part 140;

b) Safety Management Manual ICAO Document 9859;

c) ICAO Annex 19;

d) NCAA Advisory Pamphley FSS-SPQ-140-01

e) Forms FSS-GEN-FORM-603-03, 603-04, 604-02, 604-04.

4. ESTABLISHING AN SMS

4.1. Under NAM-CARS Part 140 every participant or holder of an aviation document is required to establish, implement, maintain, and adhere to an SMS appropriate to the size and complexity of their organisation.

4.2. NAM-CATS 140.02.2 describes in detail each element of the SMS and a recommended implementation plan. This guide is intended to provide a user friendly overview of each part.

4.3. The first point of action in establishing an effective SMS is establishing the roles and responsibilities of the senior accountable manager and key safety personnel regarding the SMS. At a minimum there should be one person nominated as the responsible post holder for Safety, normally designated as the safety manager.

4.3.1. The senior accountable manager and the safety manager are required by the Civil Aviation Act and the NAMCARs to meet criteria requirements and to undergo a "fit and proper person test" before the appointment can be confirmed.

4.4. Once roles have been established, one of the core components of the SMS will be the Safety Management Manual (SMM) which should be drafted by the safety manager, checked or reviewed by the quality manager (or when safety and quality are combined, this can be the flight operations manager as it needs to be an independent review), and approved by the senior accountable manager.

4.4.1. The safety manual should be constructed to comply with NCAA document FSS-GEN-FORM-603-03 Evaluation of a Safety Management Manual and is described in detail in AP 1/1/2/4/1-1/FSS-SPQ-140-01, however it should be customised to your individual operational situation. While the SMM is necessarily detailed it must also provide an effective guideline which is understandable by all employees as SMS applies to everyone involved in the organisation at all levels.

4.4.2. The Safety management manual may be an appendix to the operations manual, however it is ideally a stand-alone document.

4.4.3. Closely related to the SMM is the Emergency Response Plan, this again may be contained within the SMM or it may be, and preferably is, a stand-alone document.

4.4.4. The SMM and ERP are controlled documents and as such must include all the requirements of a controlled document, e.g. list of effective pages, effective date, document number, amendments and revision status, and outline numbering among other items, as detailed in FSS-GEN-FORM-603-03 items 1 through 14.

4.5. The Structure of the SMS follows the four pillars of safety management, namely safety policy, safety risk management, safety assurance, and safety promotion. We will discuss each in detail, inclusive of and in compliance with the content in NAMCAR 140.02.2.

4.5.1. **Safety Policy, Safety Oversight, and Objectives**

4.5.1.1. One of the first sections in your SMM following the document control will contain your company's safety policy. This is your safety vision, a copy or which is required to be displayed in a prominent place for all employees to be aware of. This statement must contain **management's commitment** to safety and will be endorsed by the accountable manager. It is important to provide this early in the document since it is the guidance behind which the SMS will be governed. For an example of a safety policy see Appendix 1.

4.5.1.2. Following on after your safety policy should be the job descriptions, or **accountability and responsibility** of all **key safety personnel**.

4.5.1.3. The Senior Accountable Manager's responsibilities must include the duties specified in NAMCAR 140 140.03.1 (6), as follows:

a) unrestricted access to work performed or activities undertaken by all other persons as employees of, and other persons rendering service under contract with, the participant or holder concerned;

b) full rights of consultation with any other person in respect of compliance required of that person;

c) powers to order cessation of any activity where such an activity endangers or is likely to endanger civil aviation safety;

d) a duty to establish liaison mechanisms in writing with the Executive Director with a view to ascertain correct ways of compliance with the safety oversight and performance, SMS requirements and interpretations of those requirements by the Executive Director, and to facilitate regular liaison between the Executive Director and the participant or holder; and

e) powers to report directly to the management of the participant or holder.

4.5.1.4. From NAM-CATS 140.03.2 The Safety Manager's functions at a minimum must include:

a) managing the SMS implementation plan on behalf of the accountable executive;

b) performing/facilitating hazard identification and safety risk analysis;

c) monitoring corrective actions and evaluating their results;

d) providing periodic reports on the organization's safety performance;

e) maintaining records and safety documentation;

f) planning and facilitating staff safety training;

g) providing independent advice on safety matters;

h) monitoring safety concerns in the aviation industry and their perceived impact on the organisations operations;

i) coordinating and communicating (on behalf of the accountable executive) with the NCAA and other State agencies as necessary on issues relating to safety; and

j) coordinating and communicating (on behalf of the accountable executive) with international organisations on issues relating to safety

4.5.1.5. Under the topic of accountabilities and responsibilities the safety manual should clearly define all personnel's duties regarding SMS. Without the participation of all SMS user groups, the SMS will not be implemented. Since the SMS is data driven and relies on the awareness of all user groups to be aware of safety, notice and report hazards, and be proactive in implementation of new preventative action barriers.

4.5.1.6. The safety policy should refer to **coordination of the emergency response** plan in terms of who is responsible for the ERP document and how it integrates with other organisations involved in the provision of service. The ERP can be included in the SMS, however preferably it is a stand alone document.

4.5.1.7. The safety policy in the SMM should reference **safety documentation**, which for ease of updating should be included as an annexure or appendix to the document. The documentation required is discussed under section 5.5.

4.5.2. **Safety Risk Management**

4.5.2.1. Following safety policy and accountabilities is safety risk management, which is the **core** of your SMS in that it contains your occurrence management, **hazard identification, risk assessment, and risk mitigation**, more commonly known as

hazard identification and risk management (HIRM). Ideally in your SMM this section will come next.

4.5.2.2. Risk assessment should be based on a risk management model. ICAO provides an example of a risk management model in ICAO Document 9859. In the risk management model, we determine risk severity, that is the nature of what is likely to occur, against risk probability, that is how likely it is to occur. This forms a Risk Matrix, as seen below in Figure 1.

Severity → Probability↓	Catastrophic (A)	Hazardous (B)	Major (C)	Minor (D)	Negligible (E)
Frequent (5)	5A	5B	5C	5D	5E
Occasional (4)	4A	4B	4C	4D	4E
Remote (3)	3A	3B	3C	3D	3E
Improbable (2)	2A	2B	2C	2D	2E
Extremely Improbable (1)	1A	1B	1C	1D	1E

Figure 1

4.5.2.3. Hazard identification will come from a combination of reactive (hazards identified from occurrences) and proactive (hazards identified without an associated event. The more an SMS generates proactive or predictive hazards, and thus mitigates risk before occurrences, the more effective the SMS becomes. See more about proactive and predictive SMS in section 6.3.

4.5.2.4. For hazard identification and occurrence management your safety management system must have reporting forms, as this is the vital safety data collected from all your users. These reporting forms form part of your safety documentation and should be an annexure or appendix to the safety management manual. At a minimum your reporting system should have the following capabilities:

a) Mandatory occurrence report (standard incident and accident report, for NCAA this should be on form FSS-GEN-FORM 014);

b) Voluntary occurrence report (internal reporting form);

c) Hazard report; and

d) Confidential report.

These reporting forms may be separate of combined.

4.5.2.5. For managing incident and hazard reports, an effective safety management system will have an incident and hazard register. This should be electronic in the form of a spreadsheet or database whereupon as the SMS matures trends can be easily determined and safety performance indicators (SPIs) established with alert levels. This incident and hazard register will become the key tool in managing your safety system and from where your safety data collection and processing (SDCPS) occurs.

4.5.2.6. Once a hazard is discovered or incident has occurred and the risk assessment is completed, the risk management process will move to investigation, the result of which will be risk mitigation and safety recommendations. Your safety management system will indicate when investigation is required, normally this is mandatory for all moderate and high risk events. The investigation will result in recommendations for risk mitigation. The risk assessment should be repeated following implementation of mitigation to determine if the risk is now in the acceptable (low) risk category. Your safety database should be capable of tracking the safety recommendations or risk mitigation for each hazard and determining the resultant acceptable levels of safety (this component normally comprises the hazard register).

4.5.3. **Safety Assurance**

4.5.3.1. Safety assurance comprises monitoring of the safety system, management of change, and continual improvement.

4.5.3.2. **Safety performance monitoring and measurement** includes development of safety performance indicators (SPIs), their safety performance targets, and alert levels. For a mature system the SPIs are developed from the data in the incident and hazard register. For a new SMS system you will need to predict likely occurrences and alert levels for your key performance indicators. A safety performance indicator will be a type of event or occurrence. The safety target or alert level will be a rate, for example one event per thousand hours or per thousand missions. An example of SPIs and alert levels can be seen in Appendix 2.

4.5.3.3. **Management of change** is necessary as whenever strategies are introduced. The safety system should have a management of change procedure, that includes a full risk assessment which is conducted prior to any change being implemented. Whenever there is change there is a risk that new hazards are introduced into the system or existing barriers are no longer effective. It is important to have a safety procedure to mitigate the potential outcome of these hazards or to establish new barriers.

4.5.3.4. Any effective SMS must contain an element of **continual improvement**. This should include at a minimum annual review of policy, procedures, and the SMM. This should also include regular feedback such as questionnaires, internal and external audits, surveys, and user meetings. Any sub-standard performance of the SMS should be identified and mitigated.

4.5.4.**Safety Promotion**

4.5.4.1.Safety promotion includes safety training and education and safety communication.

4.5.4.2.The safety manager is required to facilitate staff **SMS and safety training**. This should include induction, recurrent, and advanced training. All staff should have training on the SMS as part of their initial induction into the company, presented by the safety manager or his/her delegated representative. This will ensure the SMS is understood and utilised at all levels of the organisation. Management and post holders are further required to have specialised safety training commensurate with their duties. Recurrent or refresher training should be conducted on a regular basis particularly for operational staff.

4.5.4.3.Part of safety promotion under the scope of **safety communication** is the management and facilitation of regular safety meetings. The safety manager must manage and co-ordinate these meetings including taking and maintaining minutes and effecting any safety outcomes. See further discussion on safety meetings in section 5.4.

4.5.4.4.It is important to promulgate all types of safety promotion, for example, awareness of reporting – creating a reporting culture, providing for anonymous reporting, liaison with industry safety groups and service providers, sharing safety articles and safety feedback, safety posters, a safety noticeboard, establishment of safety email groups (for safety management and safety users, for example), surveys and communication of findings and hazards.

5. IMPLEMENTING AN SMS

5.1. The implementation of a full SMS system requires considerable time and is described in detail in four phases in NAMCATS 140.02.3. and safety managers are advised to familiarise themselves with the TS. This document provides an overview of key implementation elements.

5.2. Implementation plan and gap analysis

5.2.1. For a new SMS the four phase implementation plan detailed in NAMCATS 140.02.3 should be adopted, for an existing SMS a gap analysis should be conducted using the four phase plan as a guideline. This should be an appendix or annexure to your SMM.

5.3. Safety Training

5.3.1. The safety manager is responsible for facilitating all safety training, including specific safety training for managers and staff involved in implementation of the SMS, and safety induction and recurrent training for all employees. Records should be kept of all training, and a recurrent training system should be implemented for regular refreshers.

5.3.2. The syllabus for safety training must include at a minimum:

a) organizational safety policies, goals, and objectives;

b) organizational safety roles and responsibilities related to safety;

c) basic safety risk management principles;

d) safety reporting systems;

e) safety management support (including evaluation and audit programs);

f) lines of communication for dissemination of safety information;

g) a validation process that measures the effectiveness of training; and

h) documented initial indoctrination and recurrent training requirements.

5.3.3. The safety management training must ensure that all personnel are trained and competent to perform SMS duties, and be appropriate to individual's involvement in the SMS. This means for staff with specific roles in the safety system the safety training

should be tailored to address their specific involvement and duties with respect to the SMS.

5.3.4. Safety training is a component of SMS which deals with handling of emergencies. For air operators this includes SEPT training and for OSHE it includes basic first aid and fire marshal duties and of late pandemic response.

5.4. Meetings and Committees

5.4.1. Service providers should establish appropriate committees depending on the size of the organisation.

5.4.1.1. The highest level safety committee, which may be referred to as the **Safety Review Board.** The safety review board should be comprised of the senior accountable manager and top management or key postholders, the safety manager participates as an advisor.

5.4.1.2. The Safety Review Board monitors:

a) effectiveness of the SMS;

b) timely response in implementing necessary safety risk control actions;

c) safety performance against the organization's safety policy and objectives;

d) overall effectiveness of safety risk mitigation strategies;

e) effectiveness of the organization's safety management processes which support:

i) the declared organizational priority of safety management; and

ii) promotion of safety across the organization.

5.4.1.3. To implement the policies and directives of the safety review board there is a operational group which is comprised of frontline managers and can be chaired by the safety manager. This is normally called the **Safety Action Group**.

5.4.1.4. The safety action group should fulfil the following functions:

a) monitor operational safety performance within their functional areas of the organization and ensure that appropriate SRM activities are carried out;

b) review available safety data and identify the implementation of appropriate safety risk control strategies and ensure employee feedback is provided;

c) assess the safety impact related to the introduction of operational changes or new technologies;

d) coordinate the implementation of any actions related to safety risk controls and ensure that actions are taken promptly; and

e) review the effectiveness of specific safety risk controls.

5.4.1.5. In very small organisations the safety review board and safety action group may be combined into a safety committee.

5.4.1.6. Further to the above two meetings, it is very important that the safety manager facilitate meetings on a regular basis with the user groups, ideally on a monthly basis. These meetings are to facilitate safety communication, to discuss topical issues and hazards, and provide feedback to users about reports filed.

5.5. Safety Documentation

5.5.1. All the items described in this document should be included in your Safety Management Manual in sufficient detail and in acceptable language so that all staff and safety personnel can follow.

5.5.2. Asides from the SMM, the safety system should contain the following documentation:

a) hazards register and hazard/safety reports;

b) SPIs and related charts;

c) record of completed safety risk assessments;

d) SMS internal review or audit records;

e) internal and external safety audit records;

f) records of SMS/safety training records;

g) SMS/safety committee meeting minutes;

h) SMS implementation plan (during the initial implementation); and

i) gap analysis to support implementation plan

6. MAINTAINING AN SMS

6.1. Data capturing and Analysis

6.1.1. As mentioned in 4.5.2.4, It is important to have a mechanism for capturing the data input to the SMS and for ensuring data can be easily analysed so that any recurrent trends can be established.

6.1.2. For a simple system, a spreadsheet is effective in completing data analysis. An example of a safety spreadsheet can be found on the NCAA website, https://www.ncaa.com.na.

6.1.3. For more complex systems a dedicated database may be required. This can be established in-house, or contracted, there are many services offering database management for safety occurrences.

6.1.4. The output from your data management system should be a document called the occurrence and hazard register. This may be two separate documents or one master document containing sections for occurrences and hazards.

6.1.5. Only from effective data capture and analysis can the system monitor Safety Performance Indicators and react proactively when alert levels are reached.

6.2. Safety Performance Indicators and Targets

6.2.1. As the SMS matures your safety performance indicators and targets can grow and develop. Ideally you will see a reduction in safety critical occurrences as safety and operational training address the hazards established, and thus safety performance targets can be lowered accordingly.

6.2.2. While there should be a reduction in incidents there may also, as the SMS matures, be an increase in hazard reports as the users become more proficient at recognising hazards before they become incidents moving into the aspired for predictive phase.

6.2.3. While in establishing the SMS SPIs and SPTs are initially guess work, when maintaining an SMS you can utilise all data captured for identifying critical SPIs and occurrence levels or trends established to determine effective SPTs and alerts.

6.3. Moving from Reactive to Proactive and Predictive

6.3.1. When SMS is completely effective the system will move from reactive, that is, only reacting only after an occurrence, to proactive, and predictive.

6.3.2. A proactive SMS system will trap and identify hazards prior to incidents occurring. This can be in two ways. From complete and comprehensive analysis of occurrences to identify all the latent hazards that exist and by proactive trapping of hazards through user hazard reports.

6.3.3. A proactive system will create barriers and implement risk mitigation from occurrences and hazard reports prior to repeat occurrences.

6.3.4. A key component of the proactive safety system is a hazard register. This register will record hazards related to reports received and track barriers and mitigation implementation to effectively reduce risks to as low as reasonably practicable (ALARP).

6.3.5. To become predictive an organisation has to evaluate risks from normal operational data and discover hazards before they become incidents or accidents. This is an advanced stage of SMS and relies on comprehensive data collection and analysis and hazard recognition. Predictive SMS can also be exercised in the evaluation of risks in management of change.

6.4. Information Sharing

6.4.1. A key component of maintaining an SMS system is communication and information sharing. The organisation should have systems in place to communicate safety information from within the company and from external organisations such as safety bodies, CAAs, or manufacturers.

7. OCCURRENCE AND HAZARD REPORTING

7.1. Types of Occurrence Reporting

7.1.1. As mentioned in Section 4, at a minimum a safety system needs a solid method of reporting occurrences and hazards both internally to the company safety department and externally to the responsible government departments, in our case NCAA and DAAII.

7.1.2. For external reporting the required form is FSS-GEN-FORM 014. This should be submitted to both NCAA and DAAII for all mandatory reportable occurrences. However, it is also permitted to report to the NCAA on company forms, especially when the occurrence is a voluntary report.

7.1.3. Internal reporting includes reports that may not be under the **mandatory list in NAMCATS 140 Appendix A**, but may be mandatory for the company and the reporting system must also include and encourage voluntary reporting.

7.1.4. A robust reporting system must make available confidential reports since no matter how sound your safety culture is there may still be times reporters do not want to identify themselves.

7.1.5. The reporting system must be available for both hazards and occurrences and part of safety promotion is to encourage hazard identification.

7.1.6. A good way of establishing a confidential electronic reporting system for smaller operators, where a completely confidential database is not feasible, is to set up an email account that all users have the login. Therefore, any user can login to the account and send an anonymous email to the safety manager or safety department and the user's identity will remain confidential. NCAA maintains a confidential reporting system on the website, www.ncaa.com.na, whereby the completed form can be submitted online without any trace to the reporter.

7.1.7. While confidential reporting is essential, a non-punitive reporting system, and a reporting culture is of vital importance, whereupon users are not afraid to report, for it is far more useful for investigation purposes to have the reporter's details.

7.1.8. An email group should be set up for sharing important safety reporting information with the safety user group, and with the safety management groups or safety committees.

7.1.9. Original reports should be kept in a secure location or a secure folder with login access by the safety manager and key safety personnel alone. Deidentified reports can then be created from the original reports for sharing with users in a group folder.

7.2. Reporting Culture

7.2.1. An effective safety management system is driven by reports. Only with the establishment of a reporting-culture can the SMS be maintained to its optimum level. With a reporting-culture the SMS should be able to capture hazards before they become occurrences and thus move from reactive to proactive and predictive.

7.2.2. To develop a reporting culture, participants are encouraged to ensure reporting is a topic at all user meetings. This will include feedback on reports filed, any trends established, and providing users with reasoning behind new procedures or barriers established for mitigation (including management of change).

7.2.3. The SMS requires encouragement of all users to keep vigilant and be mindful of the concept: "**when in doubt – report**". Users should be encouraged to include as many details as possible on reports, and with a reporting culture anonymity should not be required with a non-punitive policy, however it should also be readily available for those who need it so that learning is possible from all events.

8. SUMMARY

8.1. SMS in aviation is not so much a process as a way of life and should be an integral part of every participant in your aviation organisation, from users to employees to senior managers. Only working together with a proactive safety culture can an organisation grow and establish an effective safety management system.

8.2. The NCAA actively seeks your contribution, communication, and reporting with respect to your safety management system. If you have any information you wish to share or any questions on the content herein, please contact your assigned safety inspector, and/or our safety promotion and quality (SPQ) department at spq@ncaa.na. The growth of our state safety program (SSP) depends on your contribution.

APPENDIX 1 EXAMPLE OF SAFETY POLICY STATEMENT

Safety is the first priority in all our activities. We are committed to implementing, developing, and improving strategies, management systems, and processes to ensure that all our aviation activities uphold the highest level of safety performance and meet national and international standards.

Our organisation is committed through all levels of management and staff to developing and embedding a safety culture in all our aviation activities that recognizes the importance and value of effective aviation safety management and acknowledges, at all times, that safety is paramount.

Our SMS will clearly define for all staff their accountabilities and responsibilities for the development and delivery of aviation safety strategy and performance. Further through careful data collection and analysis we aim to minimize the risks associated with aircraft operations to a point that is as low as reasonably practicable/achievable.

We will ensure that externally supplied systems and services that impact upon the safety of our operations meet our internal required safety standards.

Our safety management system aims to comply with and, wherever possible, exceed legislative and regulatory requirements and standards.

We will ensure that all staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters and are only allocated tasks commensurate with their skills. We will further ensure that sufficient skilled and trained resources are available to implement safety strategy and policy.

We commit to making available the resources needed to achieve our safety objectives, and to maintain our risk level as low as reasonably practicable.

Our SMS will establish and measure our safety performance against realistic indicators and targets to achieve the highest levels of safety standards and performance in all our aviation activities.

We encourage a reporting culture and do not punish reporters of occurrences which are honest mistakes, slips, or lapses. However, should an employee be found to be wilfully negligent they will be subject to disciplinary action. We will ensure that no action will be taken against any employee who discloses a safety concern through the hazard and occurrence reporting system, unless such disclosure indicates, beyond any reasonable doubt, gross negligence, wilful misconduct, or criminal activity.

We aim to continually improve our safety performance through continuous monitoring and measurement, regular review and adjustment of safety objectives and targets, safety audits, safety surveys, document review, and safety meetings. We will conduct safety and management reviews, and actively improve and develop our safety processes to ensure that relevant action is taken when required.

We are committed to ensuring that the application of effective aviation safety management systems is integral to all our aviation activities, with the objective of achieving the highest levels of safety standards and performance.

This safety policy will be reviewed at a minimum of annually during the company internal safety audit and safety management manual review.

Signed: Date:

_____

[NAME]
Senior Accountable Manager for [COMPANY]

APPENDIX 2 EXAMPLES OF SAFETY PERFORMANCE INDICATORS AND TARGETS

Alert levels → Indicator ↓	Alert Level 0 Low risk (target)*	Alert Level 1 moderate risk*	Alert Level 2 high risk*
Bird Strikes	1 Per 200 flight hours	3 Per 200 flight hours	5 Per 200 flight hours
Unacceptable runway conditions	1 Per 500 flight hours	3 Per 500 flight hours	4 Per 500 flight hours
Air Proximity Event (Air Prox)	1 Per 2000 flight hours	2 Per 2000 flight hours	3 Per 2000 flight hours
FOD encountered on runway, taxiway, or apron	1 Per 1000 flight hours	3 Per 1000 flight hours	4 Per 1000 flight hours
Runway Incursion	1 Per 2000 flight hours	2 Per 2000 flight hours	3 Per 2000 flight hours
Number of safety meetings held over preceding 12 months	12 safety meetings 12 safety committee meetings	8 safety meetings 8 safety committee meetings	6 safety meetings 6 safety committee meetings

*Once service providers have a full year of data these figures can be replaced by metrics, for example target should be approximately 10% below previous year. Alert levels would be first, second, and third standard deviations.