

This document is a translation made by SHK of the original response in Swedish to the safety recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the response.

Swedish Accident Investigation Authority

Measures taken in response to recommendations in the Swedish Accident Investigation Authority's (SHK) Final Report RO 2019:01 Thematic Investigation: Rescue operations involving the Swedish Maritime Administration's helicopters, Reference no. O-2/18

In the above report, SHK issues two recommendations to the Swedish Maritime Administration, and in this letter, the Swedish Maritime Administration accounts for the measures taken in response to the recommendations.

Measures taken

- *Take action to reduce the limitations of the helicopter availability, in regard to e.g. crew members' recurrency and periods off duty and the planning of exercises and duty schedules. (RO 2019:01 R5)*

At the end of 2018 and the start of 2019, there were periods of generally increased points in the risk matrix due to limited geographical knowledge and crew composition, resulting from the shortage of staff that arose in conjunction with contract negotiations. The staff shortage entailed difficulty in implementing the procedures described in the Swedish Maritime Administration's manuals for longer absences from flight duty (such as parental leave). In case of longer absences, a special training session/exercise must normally be carried out before going on call.

The Swedish Maritime Administration has considered the possibility of planning for overlapping shifts, where the incoming crew has an opportunity to exercise/train together before the outgoing crew hands over. However, this would necessitate the acquisition of more helicopters for training and increasing the working hours of the crew. The effects of shortcomings in joint training in normal situations within the helicopter operation, thus excluding exceptional

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situations such as the contract negotiations, are not of such a scope that this alone would justify such additional costs.

In the new working hours agreement, the basic schedule has periods of scheduled leave reduced from the previous 21 to 15 days. As a result, the downtime is reduced from 49 to 35 days, even in the case of leave over a full duty period. Completely eliminating variations in crew composition is not desirable, since there are strong indications that a certain rotation between bases has a positive effect on flight safety in the long term, as it counteracts the risk of developing subcultures.

- *Review the possibility of saving the forms, or parts of them, used for operational risk management, performed before each flight operation, in such a way that relevant information may be used as input for better planning, follow-up and analysis of the SAR readiness. At the same time, the integrity of individual air personnel has to be taken into consideration. (RO 2019:01 R6)*

Operational Risk Management, (ORM), is a helicopter crew's tool for daily identification and evaluation of risks. The Swedish Maritime Administration uses a special form to manage the information, but it could be handled verbally. There is no basis in the Public Access to Information and Secrecy Act (2009:400) to make the information on the form confidential. However, the form is anonymised and contains no personal data. In accordance with the Swedish Maritime Administration's document management plan, it is registered in a particular order and deleted once it is no longer relevant, i.e. after the flight.

The aim of ORM is to prevent and facilitate management of all types of risk, especially those that may arise in complicated situations and difficult conditions. As a support in the risk assessment, the information is highly valuable in the short term, but becomes obsolete the moment a new form is filled in. In the case of investigating an accident or a serious incident, relevant information is secured using the latest ORM form.

The long-term need for a basis for planning, follow-up and analysis of the preparedness of the air-sea rescue is already fulfilled by existing plans and established instructions.

The measures taken should suffice to implement the recommendations.