

I hereby acknowledge that I have received a copy of the Nashville Flight Training safety manual dated March 29, 2019.

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Flight School Safety Manual

Nashville Flight Training online safety report form:

www.nashvilleflighttraining.com/sms/

NASA Aviation Safety Reporting System:

https://asrs.arc.nasa.gov/report/electronic.html



Nashville Flight Training

Commitment to Safety and Safety Policy

The safety and well-being of our employees and customers is the foundation of everything we do at Nashville Flight Training and overrides all other considerations. It is the foundation for the success of the company. Each employee or contractor at Nashville Flight Training is committed, accountable, and has the authority to maintain the highest possible level of safety for every employee, every client, every flight, and every day.

To ensure our core value of safety is never compromised, the leadership team at Nashville Flight Training is committed to the following:

- 1. We recognize our fundamental obligation is to provide a safe environment for clients to flight train, understanding they entrust their lives to us when operating our aircraft. We will always honor this trust and will never jeopardize safety in the pursuit of other initiatives.
- 2. Our primary safety objective is to identify, monitor, and mitigate safety risks to as low as reasonably possible. To that end, we will never stop improving and advancing our Safety Program, and will provide the necessary financial, personnel, and other resources needed to manage safety risk in order to continuously build upon our robust culture of safety.
- 3. We will regularly review our safety policies and procedures and emphatically communicate these to all employees and contractors. These policies and procedures will be continually monitored, measured, and tracked.
- 4. We will ensure that all employees and contractors understand the requirement to report any safety hazard, incident, or concern. Nashville Flight Training employs a comprehensive safety reporting system which includes irregularity reporting for all operating divisions.
- 5. We will ensure that employees and contractors know they will never be disciplined for reporting a safety hazard or event, except for illegal activities or intentional disregard for regulations, policies, or procedures.

Thank you for your commitment to safety as our top value at Nashville Flight Training and for your support to never stop improving our culture of safety.

Chris Erlanson Owner/Operator Nashville Flight Training



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Four Components & Definitions of Safety Management

The SMS (Safety Management System) consists of four basic components, which are essential for a safety-orientated management system. This manual describes how the corporate processes are structured to ensure compliance with SMS requirements.

Safety Policy

Management must define policies, procedures, and organizational structures to accomplish business goals while never compromising the safe operation of the business. These elements are outlined and documented within this manual to provide the framework for SMS functional elements.

Safety Risk Management (SRM)

This element is comprised of hazard identification and analysis. Risk mitigation and management procedures to lower risk to acceptable levels.

Safety Assurance

Once mitigation or controls are developed and implemented as an output of SRM processes, the organization must ensure they are continuously practiced and effective in a changing environment. The safety assurance function reinforces the use of quality management concepts, continuous improvement, and other measurement and control processes.

Safety Promotion

Nashville Flight Training must promote safety as a core value with practices that support a sound safety culture. This component raises the level of safety awareness within the organization and fosters confidence that safety actions are taken in response to reported concerns in order to reduce safety risk and ensure the overall health of the company.



The Four SMS Components

SRM

Safety Policy

Establishes senior management's commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals

Safety Risk Management

Determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk

Safety Assurance

Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards

Safety Promotion

ed positive safety culture within all



Purpose

This Safety Manual is part of the SMS (Safety Management System) and has been developed to direct all personnel in the safe operation of Nashville Flight Training (NFT), and it is the policy that governs the operation of this organization. SMS is a proactive, integrated approach to safety management. SMS is part of an overall management process that the organization has adopted in order to ensure that the goals of Nashville Flight Training can be accomplished.

SMS embraces the principle that the identification and management of risk increases the likelihood of accomplishing the task at hand. Hazards can be identified and dealt with systematically through the Reporting Program that facilitates continuous improvement and professionalism. Auditing and monitoring processes ensure that aircraft and equipment are operated in such a way as to minimize the risks inherent to flight training operations.

Scope

The Owner establishes the scope of the SMS for Nashville Flight Training. This document applies to the employees/contractors of all operating divisions involved in the implementation and execution of the SMS at Nashville Flight Training.

Safety Management Plan

Safety management holds the key to NFT's future and affects everything we do. This Safety Manual identifies the organization's Safety Management Plan as the tool used to define how the SMS supports the organization's Mission. Management is committed to the SMS and has established leadership for the program and will continue to demonstrate, through everyday actions, the commitment to safety and its priority in the achievements of the organization.

The processes in place in the Safety Management Plan include the active involvement of all managers and supervisors, who, through planning and review, will drive efforts for continuing improvement in safety and safety performance. The key focus is the safe operations during the provision of quality flight instruction.

This Safety Manual sets forth instructions and guidance to all NFT personnel regarding their responsibilities, authorities, and performance of duties as they pertain to NFT's Safety Management System.



Organization Structure & Safety Responsibilities

The organization's Owner is ultimately responsible for the organization's safety and accountable for resource provisions.

Managerial commitment and accountability will be reviewed periodically to aid in ensuring NFT's continuous improvements in safety risk mitigation, required regulatory compliance, employee reporting and acceptable behavior.

The Owner is responsible for the following safety accountabilities:

- Conducting all operations in the safest manner practicable.
- Developing long-term safety objectives, including the establishment of safety policies and practices.
- Implementing management systems that will establish and maintain safe work practices.
- Identifying all management positions necessary to cumulatively provide policies, procedures oversight and safety program rigor.
- Ensuring all operational safety related positions' responsibility and authority are defined, documented and communicated.
- Identification and development of resources to achieve safe operations.
- Observing and controlling safety systems by monitoring and supervising personnel.
- Measuring operations personnel performance compliance with organizational goals, objectives and regulatory requirements.
- Reviewing standards and the practices of all personnel as they impact operational safety.
- Ensuring all flight and ground operations personnel understand and comply with applicable regulatory requirements, standards and the organization's safety policies and procedures.



- Identification and development of resources to achieve safe operations.
- Reviewing standards and the practices of organization personnel as they impact safety.

The Safety Manager is responsible for:

- Ensuring SMS processes are established, implemented and maintained.
- Maintaining and reporting all safety related data.
- Providing information on hazard and risk analysis.
- Defining and establishing a procedure for risk management.
- Assisting the owner in incident and accident investigations.
- Reporting to the owner on safety observations, safety reports and discussion concerning remedial actions.

The Safety Facilitator is responsible for:

- Monitoring SMS processes and procedures.
- Facilitating safe operations and procedures concerning ground facilities and equipment.
- Assisting the owner in incident and accident investigations.
- Reporting to the owner on safety observations, safety reports and discussion concerning remedial actions.



Safety Principles

- Always operate in the safest manner practicable.
- Never take unnecessary risks.
- Familiarity and prolonged exposure without a mishap leads to a loss of appreciation of risk. Safe does not mean risk free.
- Everyone is responsible for properly reporting identified and/or managed risk.
- Safety is everyone's responsibility.

Safety Policy

Management is accountable for safety performance and is committed to providing safe, healthy, secure work conditions and attitudes with the objective of having an incident-free workplace. Making safety excellence part of all activities strengthens the organization. The organization's leaders are committed to:

- The ongoing pursuit of an incident-free workplace, including no harm to people, no damage to equipment or property.
- A culture of open reporting of all safety hazards in which management will not initiate disciplinary action against any personnel who, in good faith, discloses a hazard or safety occurrence due to unintentional conduct.
- Regular and ongoing support for safety training and awareness programs.
- Monitoring of safety policies, procedures and practices for effectiveness and possibility of improvement.
- Monitoring industry activity to ensure best safety practices are incorporated into the organization.
- Providing and promoting the necessary resources to support this policy.



- Requiring all employees are responsible for maintaining a safe work environment through adherence to approved policies, procedures and training.
- Requiring all employees to familiarize themselves and comply with safety policies and procedures.
- Periodically measuring performance objectives and design expectations of the Safety Policy.
- Periodically discussing methods to convey expectations of the Safety Policy.

Compliance with Standards

All personnel have a duty to comply with approved standards including, organization policy and procedures, equipment manufacturer's operating procedures and limitations and government regulations. Research shows that once you start deviating from the rules, you are almost twice as likely to commit an error with serious consequences.

Breaking the rules usually does not result in an accident; however, it always results in greater risk for the operation; and the organization supports the principle, "Never take unnecessary risks."

Training

In order for NFT to provide safe, high quality flight instruction, it is important that employees, contractors and associates participate in ongoing training and education respective to their roles. The training will commensurate with positions, leadership roles and the impact it will have on safety and company service.

Results and findings from observations and reports are used to identify and develop training and education programs designed to address individual needs, thus insuring a consistent level of competency throughout the NFT departments.



Employees, contractors and associates shall receive Safety training, which includes:

- Organization commitment to safety
- Organization General Policies and Procedures
- Employee's role in SMS
- Process for reporting occurrences
- Applicable emergency procedures

Intentional Non-Compliance with Standards

Behavior is a function of consequences. Management is committed to identifying deviations from standards and taking immediate corrective action. Corrective action can include counseling, training, discipline, grounding or removal. Corrective action must be consistent and fair.

Organization management makes a clear distinction between honest mistakes and intentional non-compliance with standards. Honest mistakes occur, and they are addressed through counseling and training.

Research has shown that most accidents involve some form of flawed decision-making. This most often involves non-compliance with known standards. Non-compliance rarely results in an accident; however, it always results in greater risk for the operation. Organization policy agrees with the following conclusions:

- Compliance with known procedures produces known outcomes
- Compliance with standards helps guarantee repeatable results
- Poor rules produce poor results
- Complacency affects the safe operation of the aircraft and cannot be tolerated
- Standards are mechanisms for change
- The hardest thing to do and the right thing to do are often the same thing



Safety Promotion

Safety is promoted as a "core value" within the organization. Procedures, practices and allocation of resources and training clearly demonstrate the organization's commitment to safety. The following methods are used to promote safety:

- Post the Safety Policy in prominent locations around the facility
- Staff meetings with a comment or review about safety issues
- · Have a safety bulletin board
- Have an employee safety feedback process

Hazard Identification & Risk Management

The systematic identification and control of all major hazards is foundational. The success of the organization depends on the effectiveness of its risk and hazard management. Hazards are identified through employee reporting, safety meetings, audits and inspections.

Risk management is the identification and control of risk. It is the responsibility of every member of the organization. The first goal of risk management is to avoid the hazard.

Correcting Hazards & Preventing Recurrence

NFT's management will ensure that proper personnel are assigned to facilitate corrective action and prevent similar future occurrences. Examples of preventive action include, but are not limited to:

- Replacement of all defective and/or broken tools and equipment
- Revision of the NFT's Safety Manual or General Policies and Guidelines
- Training of personnel
- Monitoring the hazard to ensure that it remains corrected or controlled
- Dissemination of findings from all safety-related investigations to all employees



Corrective action may take place in the form of an Initial Action or a Safety Committee recommendation:

• Initial Action will vary depending on the nature and severity of the situation.

Emergency situations require immediate attention, and use of the equipment or process should be suspended immediately until further investigation either substantiates or clears the need for suspension. Frequently, the initial action may be the only required action.

- A Safety Committee may recommend further action to rectify the situation.
- Completion of Corrective Action: Upon completion of the corrective action, The Safety Manager will be responsible for the dissemination of the safety-related results to all employees.

Occurrence & Hazard Reporting

All employees are encouraged to report all incidents, accidents, near-misses, etc. so that they may be analyzed in the interest of developing a better process.

So long as an issue is brought forth proactively and in good faith, and the individual was not reckless or intentionally negligent in their actions (i.e., knowingly choosing to do something he/she knows to be unsafe or in conflict with NFT's policies with clear understanding of the likely consequences, rather than make a different choice), there will be no punishment or reprisal against the individual(s) making the report.

The primary way to report any concerns related to safety, maintenance or quality of care is to file a Safety Report on NFT's home website. All reports (i.e. incidents, near misses, observations, suggestions, hazards, etc.) are generated utilizing the same format. All reports are initially filed as "General Issues" and are later classified into one of several categories by the Owner & Safety Manager. Categories that require a filed safety report, include:

- If evasive action was taken due to loss of aircraft separation and/or possible collision
- Any instance of inadequate terrain clearance
- Pilot's loss of situational awareness resulting in his/her loss of position for more than 5 minutes
- Failure of navigation or communication system
- Electrical failure resulting in a precautionary landing



- Any physical damage to the aircraft, propeller, NFT property, or people
- Any unintentional exit from a paved surface while landing, taking off, or taxiing
- Critically low fuel quantity or landing with less than the prescribed reserve fuel load
- Any airframe icing encounter
- Severe turbulence
- Any evacuation of an aircraft for emergency purposes
- Engine failure or partial power loss
- Any ditching or controlled landing that is not on an airport runway
- Any intentional or unintentional violation of NFT's Flight School Operations Manual
- Any runway incursion
- Landing on the wrong runway or at the wrong airport
- Any departure or excursion from the runway
- Weather related injury or damage
- Significant fuel leak
- Takeoff with a significant weight and balance error
- Injury to any person while in or outside the aircraft
- Lighting strike or bird strike
- Damage to aircraft by ground equipment
- Damage to non-company property
- Fire, explosion, smoke, or toxic fumes in or on the aircraft
- Any unsafe ramp actions or conditions
- Any Inadvertent flight into IMC



Members may also report a concern verbally, in writing or via e-mail to any member of leadership. However, completing an online safety Report is preferred because reports or observations made utilizing other means potentially:

- Are not introduced into the workflow and may not reach the right person.
- Do not remain on file in a central location for monitoring trends or documenting loop closure.

While face-to-face conversation or ongoing electronic discussion are, and will be, an important component of any investigation; documenting the details of the original event is important to the long-term function of the Safety and Total Quality Management System.

NFT seeks to build an environment where reports can be made with no fear of repercussions or punitive action within an environment that allows for thorough investigation of the matter. As such, there should be no need for making an anonymous report. However, if you are more comfortable doing so, you may either submit a report, submit a written account to any member of management or ask a trusted colleague to file a report and label it as a third party submission for an anonymous source. Keep in mind, however, that it can be very difficult to thoroughly investigate an event without being able to ask further questions.

Review Process

Items for review will be most commonly channeled to the Owner & Safety Manager; but any other NFT employee deemed appropriate to handle the details in question may be appointed accountability for progression on developing appropriate risk mitigation(s). Based on the severity of the reported item, it may receive an immediate review or be placed on the agenda for a Safety Committee meeting. If there are multiple reported items for review, a Safety Committee will be responsible for prioritizing them.

Severity Criteria After receipt of a safety report the Owner & Safety Manager will assign the severity of the incident based off the following.

- Level 1 "Report"
- o No Safety Impact
- Level 2 "Occurrence"
- o No first aid treatment



- o No aircraft damage
- o No Violation
- o No negative impact on RFS corporate Image
- o Negligible environmental impact
- Level 3 "Minor Event"
- o Medical treatment beyond first aid
- o Aircraft damage
- o Violation of RFS policy or Procedure
- o Minor effect on corporate image
- o Minor environmental impact
- Level 4 "Major Event"
- o Hospitalization
- o Aircraft Loss
- o FAA Violation with potential threat to operating certificate
- o Significant effect on corporate image
- o Major environmental impact

Immediate Review

An immediate review will be triggered anytime:

- An aircraft is damaged during a flight or maintenance operation
- An employee, contractor, or customer is injured



• The Owner or Safety Manager reviewing the initial report deems the event to be "High Priority"

The Owner or Safety Manager receiving the initial report will convene a preliminary review group within two (2) business days following the report of the event. There will be at least three people on the group, and the members of the group should agree before any investigation begins that the makeup of the group is appropriate for the task at hand.

This group will perform a root cause analysis to identify what procedural or environmental factors led to the occurrence and will identify causal and contributing factors alike.

Routine Review

All other events will be placed on the agenda for the next staff meeting. Staff may be assigned to undertake preliminary research to present at the time.

Safety Committee – a program-wide safety committee will meet at a self appointed time to provide support and serve as a resource in the development and implementation and maintenance of a comprehensive SMS, and may be convened more frequently as needs dictate. The committee may be comprised of:

- The Owner
- The Safety Manager
- Chief or a Senior Instructor
- General Manager

Safety Committee Responsibilities include:

- Identify unsafe work practices and conditions and suggest appropriate remedies with action plans.
- Conduct health and safety inspections of operations and facilities; identify safety hazards and recommend corrective measures.
- Encourage ideas and feedback from all staff with regard to safety-related and health-related ideas, problems and solutions.
- Develop programs to secure compliance with organizational, state and federal mandated safety and health regulations.



Communication of Safety Issues

Proper communication with all personnel, both up and down the chain of command, concerning safety hazards and the methods used to control and/or mitigate them is paramount and will facilitate the safest possible work environment. The system for communicating with personnel on safety issues includes:

Safety Manual: A copy of this manual is maintained by each operational supervisor, CFI's, pertinent personnel and is always available for review.

Safety Committee Meetings: The Safety Manager will facilitate Safety Committee Meetings not less than quarterly. During these meetings, the committee shall discuss and document all items, such as:

- New hazards that have been introduced or discovered in the workplace.
- Causes of any recent incidents or injuries.
- Corrective actions adopted by NFT to prevent similar mishaps in the future.
- Any health, safety, environmental and/or training issue requiring attention.
- The need to move items identified as "non-safety-related" to other committees or personnel for further, and more appropriate, review.
- Safety related discoveries and concerns will be communicated to all employees, contractors and appropriate personnel via any communication media appropriate and available.

Safety Briefings: shall be conducted during the monthly NFT CFI luncheon and shall include committee recommendations, concerns and updates.

Safety Reporting Form: NFT has a system of notification whereby personnel who wish to inform the company of safety hazards may do so by utilizing the organization's website. The form may be submitted anonymously at the discretion of the submitter, and all such reports will be investigated in a prompt and thorough manner.

E-mail: Information regarding safety issues may be transmitted through the company's e-mail system.



Safety Communication Boards: Safety information will be posted, as needed, on Safety Boards within the facility. The boards are maintained by The Safety Manager. Personnel are required to view data on the boards.

Safety Training: Safety training shall be accomplished through daily crew interaction, initial employee/contractor on boarding procedures and monthly CFI luncheon safety briefings.

Occurrences

Personnel who report are to be treated fairly and justly, without punitive action from management, except in the case of known reckless disregard for regulations and standards or repeated substandard performance. At NFT, safety is integrated into our culture and every act performed. To achieve the primary goal a safe and efficient operation, everyone must actively participate. Unsafe or careless behavior or actions will be taken seriously and ultimately be reviewed by the owner for proper disposition.

Occurrence Investigation & Analysis

Significant occurrences are investigated by the Owner and Safety Manager or their designee. Additionally, The Safety Manager reviews the database for previous occurrences in order to identify trends. All work-related incidents and near misses will be investigated in a timely manner. A proper investigation of any mishap is the precursor to preventing a future mishap of a similar nature.

The Safety Manager, will investigate all incidents and mishaps involving NFT equipment and/or personnel and report the findings back to the owner. All incident shall be investigated as promptly as possible. When conducting an investigation, the investigator shall:

- Visit the scene as soon as possible. This will ensure that the scene has retained, as closely as possible, the position of all equipment, wreckage, switch positions, etc., as well as capture witness marks created during the mishap.
- Save or preserve all physical evidence.
- Document details graphically using video, photographs, sketches or diagrams wherever appropriate. Handheld GPS may be utilized to identify exact location of parts.
- Conduct interviews:

o When possible, the investigator shall interview the mishap employee(s) as soon as they are physically and mentally able.



o Interview witnesses to the incident, either at the scene or as soon as possible after the mishap.

- o Obtain signed statements from crew and witnesses.
- Prepare and file report. All reports of safety-related investigations will be presented to the Program Manager and a copy will be provided for The Safety Manager to maintain. Reports will list the factual findings, an analysis of circumstances, cause(s) of the incident and recommendations for action to prevent future mishaps.

Safety Assurance Oversight Programs

The organization conducts quarterly facility inspections. Records of facility inspections and the resolution of actions are maintained by The Safety Manager. Issues identified in inspections are included in the agenda of the Safety Meeting. The Safety Manager is responsible for storing these documents and will conduct the annual audits of the SMS. Findings and associated corrective actions shall be recorded in the audit.

Audits not only ensure continued compliance with rules and regulations, but also identify new hazards. Data will be collected as necessary during audits that establishes operational processes, SMS, hazard identification, and system assessments.

The Safety Manager manages and stores audit reports, which include findings and recommended corrective actions. Positive findings are also recorded. Findings and recommended actions are communicated to all personnel.



Performance Management

Continuous improvement and exemplary service to our customers is a "core value". Safety performance is measured by the following performance measures:

- Reduce the number of incidents that cause damage, and the amount of damage
- Reduce the number of injuries to organizational personnel, guests and passengers
- Increase the number of actions raised from safety meetings
- Reduce the number of non-compliances with standard flight operations procedures as measured by observation.
- Increase compliance with the safety incident management process (reporting, classification, root cause investigation and implementation of corrective actions)

Safety Stand-Down Program

A Nashville Flight Training "Safety Stand-Down" is a dedicated period of time, usually one half to two days, when the entire program concentrates on safety issues and training. Usually all other operations cease during the safety stand-down. This is an organization-wide event, so participation is mandatory by all personnel.

A safety stand-down is generally directed by the Owner in response to a serious mishap or near mishap, or to improve safety awareness in response to serious hazards or risk conditions. Safety stand-downs can be conducted at any time.

NFT can use this tool as a means to address specific concerns, at their discretion. The FAA, NTSB and other higher authorities occasionally will recommend industry wide safety stand-downs to address their concerns.



Our Goal

A goal of "zero" accidents is achievable. On the way to that goal we will reduce preventable accidents, because we as an organization can not tolerate preventable accidents. NFT's continued existence and viability hinges on this foundation of safety. We owe our best efforts to our clients, all personnel that comprise NFT, our aviation community & industry.

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NASA Aviation Safety Reporting System:

https://asrs.arc.nasa.gov/report/electronic.html

