CHANGE? IT'S A QUESTION OF MANAGEMENT

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Editorial

Companies need to consider the impact on personnel, so early communication and engagement with staff is crucial

A belated Happy New Year to all our readers. Let's hope that the continued recovery of aviation post-COVID is matched this year by an increase in resources to meet schedule requirements and that the many lessons from the highly-pressured summer of 2022 are taken on board for operations in 2023. In the last 6 months of 2022, CHIRP received 233 Air Transport reports of which a considerable number related to changes introduced as organisations come to terms with the new

realities of post-COVID operations and economic pressures. Issues such as fatigue from pressured rosters, inadequate sickness policies, planned use of discretion within rosters, problems following changes in service provider, poorly introduced software updates and equipment upgrades all featured and are being worked through with the CAA and the companies concerned: many of these are indicative of the need for more effective change management and the need to recognise and incorporate variations to previously established risk profiles.

ICAO recognises the need for change management within ICAO Doc 9859 Safety Management Manual, 4th Edition, 2018 Sections 8.5.6 and 9.5.5 which provide frameworks and examples for the sorts of changes that are likely to trigger formal change management requirements such as: introduction of new technology or equipment; changes in the operating environment; changes in key personnel; significant changes in staffing levels; changes in safety regulatory requirements; significant restructuring of the organization; and physical changes (new facility or base, aerodrome layout changes etc).

ICAO goes on to comment that before introducing any change in a system (operational or organisational), a detailed description of the particular change, the potential associated hazards, as well as impacts to other interfacing systems and the effectiveness of existing defences should be reviewed so that the proposed changes can be planned and executed in a structured way. In particular, new hazards and related safety risks may be inadvertently introduced into an operation even when small isolated changes occur, and no operation should take place in a changed system or operational context until all safety risks are considered.

Looking at the post-COVID operating context in particular, we've seen some of the biggest global changes to aviation operations in recent history, which is all the more reason to initiate robust change management processes through company SMSs to ensure that changes are properly considered in all their facets. That is what the SMS is there for – to provide a systematic approach to risk management and decision making so that more obscure or interrelated aspects are not missed. In this respect, and although published in response to COVID in August 2020, CAA Safety Notice SN-2020/015 'Effective Change Management for Organisations During Covid-19' provides a very useful summary of recommendations, considerations and frameworks that can be employed in the management of change in aviation.

But it's not only the introduction of new procedures or equipment that should attract attention. As mentioned in a related Skybrary article on Management of Change, as a system evolves, seemingly small, incremental changes can also accumulate over time and an important part of change management is to periodically review the baseline hazard analysis to determine its continued validity. The start of a New Year often brings with it the need to refresh periodic risk assessments and this is the ideal time to review what might have changed last year both in macro and micro terms.

Fundamental to effective change management, organisations should also consider the impact of any changes on personnel because this could affect the way a change is accepted by those involved. Early communication and engagement will normally improve the way a change is perceived and implemented and, in Human Factors terms – be it the introduction of new equipment, processes, route structures, fatigue risk management systems, service providers or organisational policies – any economic or operational changes must always take into account a fulsome and candid appraisal of the associated risks and impacts on those enacting the change.

In this respect, and whilst continuous improvement is of course always desirable, many of the procedures and structures that exist in aviation have been hard-won through bitter experience and lives lost. Theoretical modelling and assessments of any changes are useful tools, but the real-life experiences of those enacting any change must also be taken into account as theory meets the reality of operational actuality. It appears to CHIRP that, too often, economics or the haste to introduce changes sometimes override a cautious approach to hazard analysis, risk assessment, the practical realities of operations and an effective acknowledgement of workforce concerns and occurrence reports. Breakdown of company monitoring/safety systems, failure to feedback on occurrence reports, gaps in transition between company systems and seeming lack of regard for workforce concerns have all been evident in recent use of CHIRP as a reporting conduit of last resort when company internal processes fail during change management.

As a final thought, many new staff will have been hired over the last few months as companies recover to full manning, and many of these new staff may not have extensive experience of aviation, especially winter operations. The 3 Cs of Caution, Consideration and Courtesy for others apply now more than ever – do those ground operators really understand your requirements, has that FO much experience of operations into winter-bound airfields, do you need to allow a little extra time, space and understanding all round for those who may not be familiar with bad-weather operations?

Steve Forward, Director Aviation

Engineering Editorial

Let's start with all due sympathy for all staff that had to work on the principal festive dates due to shift cover; the travelling public will no doubt be forever grateful. The New Year date change and a fresh year ahead means the restart of all the annual projects that a maintenance operation must consider: 2023 shelf-lives and calibration dates may have seemed a long way off towards the end of last year but some may now be imminent.

This year's Recurrent Training also needs to be scheduled, hopefully with an inspiring instructor and not mind-numbingly boring CBT based on old familiar examples. As an example, Dangerous Goods Training needs to reflect the ICAO Technical Instructions (TI) using a Competency Based Approach to Training and Assessment (CBTA) and is now a mandatory requirement for those involved

effective 1 January 2023 (see UK CAA Skywise Alerts [SW2022/344](#) and [SW2022/363](#)). If you do not fall into the category of staff that require the revised training, do not think for one moment that Dangerous Goods are nothing to do with you. A customer's spare battery deposited into the rear freight hold may be the same type of battery as one bolted and connected in the equipment bay but your act of assisting the customer just put the aircraft at risk and the regulations have been contravened.

The New Year requires that Risk Assessments will have to be revisited, although accepted wisdom suggests that risk assessment should be iteratively reviewed throughout the year. Areas with ongoing reduced staff levels may make risk assessments seem to be an unwelcome burden, or a luxury that can be skipped, but that approach must be resisted if we are to ensure the continued safety of our operations.

We all carry out risk assessments prior to undertaking an individual task, even if only subconsciously. How well placed is the organisation you work for to commence a raft of new risk assessments? For those staff who normally carry out formal risk assessments, how well prepared are you? Do you remember the difference between a hazard and a consequence? Could you still visualise your Risk Tolerability Matrix showing Severity against Likelihood? Has the company risk assessment process been changed since the last time to adopt modern thinking, including the documentation of assumptions, and how are surprises addressed?

Has the period since the last assessment brought about changes that the last assessment did not feature; IT changes for example or fleet additions perhaps? Have any Maintenance errors occurred in the last year that the risk assessment at the time did not prevent? Were there any Internal Reports that indicate last year's risk assessment is now lacking? Have previously recommended actions been implemented and were they successful? Is your employer using the same service providers?

That newly contracted crane driver lifting off an engine may not possess the knowledge and experience of the previous contractor. If you query the fact that the crane is covered in building site debris that might contaminate the hangar, is the driver going to clean it off onto the ramp outside the hangar doors? This years' supplier may be cheaper and therefore not as sophisticated as that risk-assessed last year. Plenty of risk assessments would have been carried out last year due to new staff joining an organisation but has an assumption since then been made that all new staff are genuinely up to speed, or are there still gaps in knowledge waiting to surface as a latent error?

Everything we do has some element of risk, and not all risks can be mitigated against. The aim is to get the overall risk 'As Low As Reasonably Practicable (ALARP)', also now referred to in some circles as 'As Far As Practical (AFAP) in recognition of the highly subjective nature of the word 'Reasonable'. We must calculate the Tolerability of accepting some of the risk/s and consider the balance of investment in production, versus the investment in safety. In doing this, there is great merit in

conducting risk assessments with all staff. Who better to identify and analyse the risks than the staff members involved? This concept also contributes to an organisation's Safety Culture, and brainstorming for a risk assessment brings staff together. To include many staff in risk assessments requires training which, needless to say, carries a cost but this could be part of recurrent safety training and could reduce staff spending time away from the work area.

Finally, whilst organisations are responsible for implementing and facilitating an effective Safety Management System (SMS), it is the role of employees to be mindful of, and operate within, the policies and procedures that are published. Perhaps the new year is the time to consider how well the SMS is performing. Is it a collection of procedures that simply satisfy regulations but have little real relevance to the operation? SMSs should be based on User-Centric Design (UCD) – i.e. be applicable to the work as actually being done rather than the work that management imagine or believe is being done. Just as our risk assessors are chosen for their task familiarity, UCD focuses on the requirements of the user of the SMS. Quality Control and compliance with the Company Procedures (SMS or other procedures) is the responsibility of the staff fulfilling the task, and the procedures should be regarded as belonging to the staff that use them, not solely the heads of departments. The SMS should provide a vehicle to allow staff to instigate changes to the current procedures. Perhaps we can make 2023 the year of all staff improving our organisations' Safety Cultures and SMSs.

Have a great year and bear in mind that worrying about the post-Christmas credit card at work is a Human Factor issue. Roll on Spring.

Phil Young, Engineering Programme Manager

Comments on Previous FEEDBACKS

Comment No 1 – Sickness management

Glad you have finally woken up to this issue of pilots being pressured to work when sick [Editorial Air Transport FEEDBACK Edition 144]. I have written to you before about this and the reply I got was dismissive. Because of this pressure there are pilots and cabin crew everyday turning up to work when they shouldn't. [Airline] has a desk of people whose sole job is to apply pressure to people who go sick. This is no secret, they are in the main crew check-in area. They of course will claim they are there to help but if you actually ask them for help they quickly fob you off. The fact that many people have reported this to you and nothing has been done is a disgrace. If you really mean what you say than this needs to be your top priority.

CHIRP Response: We're grateful for any feedback on our work, be they plaudits or brickbats. In our defence on sickness policies, we've been representing the problem to the CAA and airlines since at least 2018 and probably regularly before that if I was to look up our files before my time as Dir Avn. Our problem is that we at CHIRP have no powers to fix anything and so all we can do is to keep

banging the drum with airlines and companies to get things changed. Sometimes frustrations mount as we seem not to get anywhere and so that's why I chose to make it a feature of my editorial to raise its profile again publicly. Perhaps encouragingly the CAA responded that they also think that there's scope for doing something, but we've had false dawns before. At least they are talking with the likes of the UK Flight Safety Committee to scope the problem of absence/sickness management policies they tell me. Sickness and absence management is something bigger than individual companies and so that's why we're supporting their initiative to look for an industry-wide, best-practice approach but, as with most things, that'll be a long-term solution.

Late-breaking news is that as a result of CHIRP's representations, the CAA have been able to engage with one airline in particular about their sickness policy and that airline now has a revised attendance management scheme in place that takes a more enlightened approach to pay and days off when sick. Sometimes such successes are few and far between but this outcome illustrates the value of reporting to CHIRP when the usual avenues of engagement do not lead to a satisfactory outcome.

With regard to priorities, we try our best to keep things bubbling across the board but we're largely a one-man/one-women band short on (part time) resources so pretty much everything becomes a top priority, especially at the moment with reports of fatigue, bullying, sickness/absence management, use of discretion, rostering, ground handling pressures, ATC resources, I could go on… As we come out of COVID there are many 'top priorities' that we're trying to champion and keep in the minds of the regulator and companies. To be fair to the regulator, they listen and say that they are engaging with the companies but tangible progress is sometimes slow, not least because they themselves are somewhat hampered by the regulations (carried forward from BREXIT for expediency) which, in typical European fashion, are vague and lack teeth in many areas; the CAA say they have aspirations to review and refocus them on UK requirements but resources to do so must compete with other priorities.

Comment No 2 – Living with COVID

I refer to your comments concerning positive Covid tests [Air Transport FEEDBACK Edition 144]. This needs some further explanation. There is no reason why you should not attend work having produced a positive outcome with a SARS-CoV-2 rapid test. It is really a matter whether the person involved has symptoms that are incapacitating or likely to be incapacitating. In terms of coming to work with a positive test this is a cultural and social issue. You should not lose sight of the fact at the present time the infection rate is currently 1 per 35 persons in England and increasing so it is highly likely that you are already in contact with an infected person. We are going to have to learn to live with Covid along with the Influenza/Respiratory Syncytial virus.

CHIRP Response: This comment again refers to the editorial where one of the quoted sickness reports mentioned that a Cabin Crew member had stayed away from work due to testing positive

for COVID and had lost pay as a result. The background to this report was that it was received in early summer and, whilst we don't know what the specific date of the Cabin Crew's reported comments was, perhaps they were at a time when they were required by their particular company to stay away from work. Whether they were actually suffering from symptoms of COVID is unknown by us, and individual airlines have differing policies, but the underlying regulatory requirement is to stay away from work if suffering from symptoms that make you unfit to fly. The thrust of the editorial was to highlight company sickness policies and this particular COVID comment was just part of a wider piece about inconsistencies in the way that sickness and absence are being handled by companies. We hope that the comment about COVID didn't detract from that particular aim.

Comment No 3 – Pronouns

The pronoun "they " was used to refer to the captain several times in your response to a report [Air Transport FEEDBACK Edition 144, Report No 8 (FC5219)]. In one instance it was used when talking about the captain in a verbal dispute with cabin crew members. It was difficult to understand who was talking to whom. Please cease this politically correct idiocy and continue to use correct English. The use of "they" in this way is grammatically incorrect and potentially confusing. As you are no doubt aware it is also encouraged by the current gender hysteria. Why not simply continue to use the word Captain?

CHIRP Response: We don't use the pronoun 'they' out of politically correct idiocy but as a deliberate policy to assist in protecting confidentiality. Many small airlines have few female captains for example and so if we used 'she' then it could narrow down the field if someone was familiar with the circumstances. Repetitive use of 'the Captain' or other titles can become stilted in reported speech so we'll continue to also use 'they' in reports where appropriate but it's a fair point that we need to make sure that in doing so we do not detract from the ability to understand the report itself.