

TRUST IN MANAGEMENT AND CULTURES IS THE KEY TO PROMOTING CONFIDENCE IN SAFETY REPORTING

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Category: [Air Transport](#)

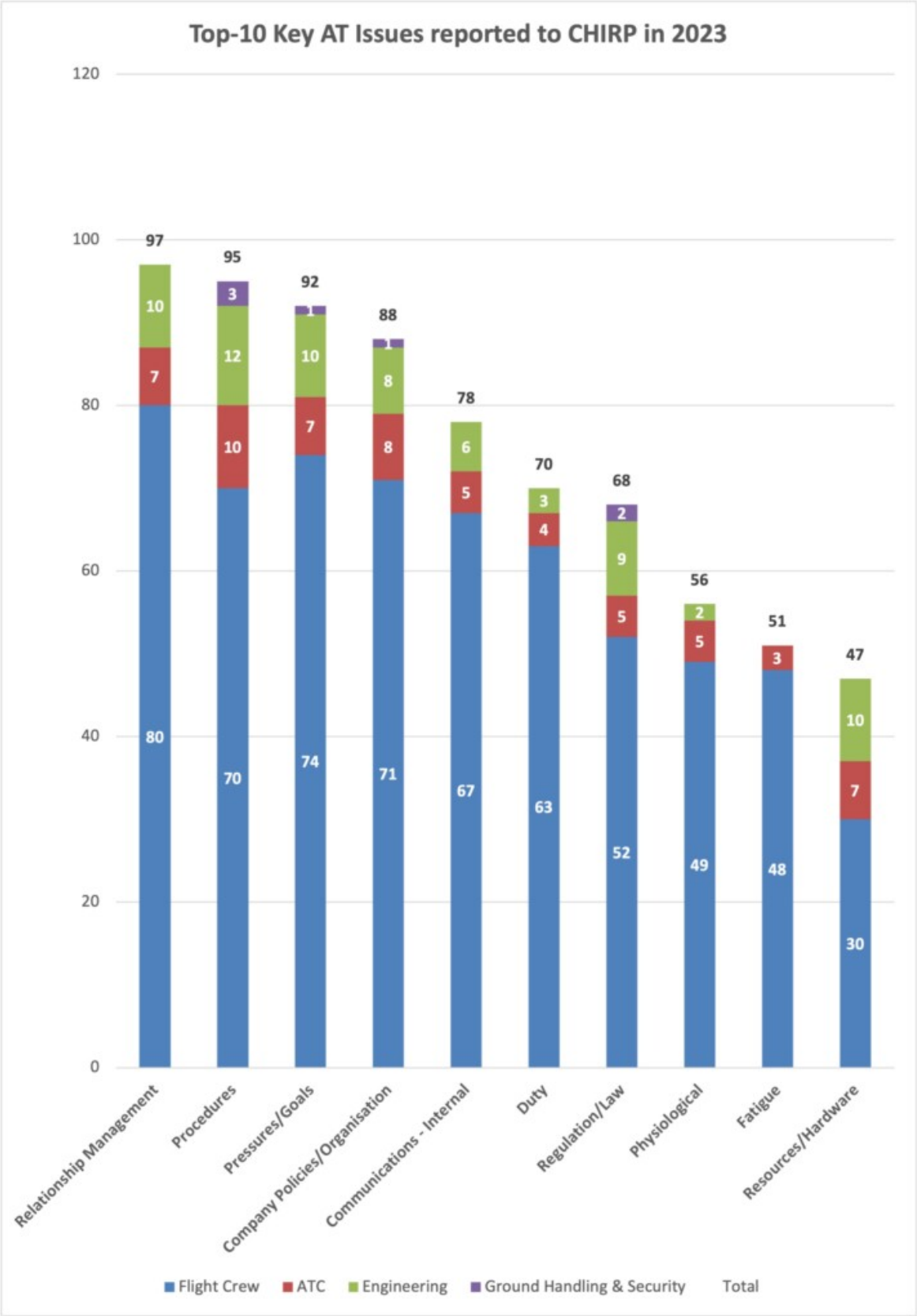
EditionATFB 150

Editorial

Looking back at 2023 – CHIRP reporting themes

Now that we are firmly established in 2024, I've had time to review the reporting statistics that *CHIRP* saw in 2023. In total, we received 514 reports from all sources, with 132 of these being from the Air Transport (AT) sector (Flight Crew, Engineering, ATC and Ground Handling & Security – note that Cabin Crew reporting is assessed separately at *CHIRP* as its own sector). This shows a return to normal levels of reporting post-pandemic, albeit slightly below 2022 levels (169 reports) which reflected increased concerns as aviation returned in the immediate post-pandemic period.

The top-10 issues raised in the AT sector in 2023 are shown in the bar chart, with the second block chart at the end of the newsletter focusing on Flight Crew reporting as the largest element of the sector. Note that a single report can have more than one issue associated with it and so that is why there are more issues than reports.



The Flight Crew chart at the end shows the breakdown of sub-issues within the headline top-10 themes and its worth taking some time to review these. Historically, duty, fatigue and rostering/FTLs have been the mainstay of flight crew reporting to *CHIRP* over the years but, interestingly, in 2023 the themes are more to do with company policies, relations with management, and pressures/goals.

No-one doubts that everyone is working hard at the coal-face to meet scheduling demands and do all they can to ensure company profitability, and people will often go the extra mile to keep things on track. But the analysis hints that relations with managers are at risk of breaking down because crews don't feel that they are being listened to, communicated with, or being treated with respect. Once the feeling of trust breaks down and the perception of Just Culture is lost, things can derail very quickly in safety terms due to lack of reporting.

Within this, rostering, fatigue and absence management continue to be common themes in flight crew reports to *CHIRP*. Flight crew generally write to us when they have exhausted other options or grown disillusioned with fatigue reporting to the point of no longer bothering to report formally. Anecdotal evidence suggests that the issues reported to *CHIRP* are widely recognised among crews, and under-reporting is believed to be widespread; the reports seen by *CHIRP* may be the tip of the iceberg. It is part of the human condition that we find it difficult to discern a gradual accumulation of fatigue and corresponding erosion of performance, and aviation workers are perhaps more susceptible to accumulated fatigue because of their default 'can do' attitude. Flight crew are also subject to overt pressure to operate into discretion, including from home base and hubs, and all crews acutely perceive the pressure of company and passenger expectations. These factors weaken the safety barrier of declaring themselves unfit through fatigue. It is further undermined when operators do not respond appropriately and sympathetically to people declaring themselves fatigued during or after a duty. Operators who do not adequately distinguish between fatigue, illness and unauthorised absence, and those who react with perceived hostility to reports, create strong disincentives to fatigue reporting and create associated inducements to press-on as rostered.

People recognise that they are assets in a competitive industry and that their employers need to utilise them effectively and efficiently, but those reporting to *CHIRP* also express little confidence in operators' Fatigue Risk Management Systems (FRMS) or the associated regulators' interventions. They see their employers rostering within the numerical constraints of FTL but tell us that they perceive little evidence of compliance with the over-arching requirements to minimise crew-members' fatigue. An example being the move of reporting points to the aircraft gate for some companies which therefore lays the burden of delays getting airside and through security on the crews rather than the company. The result being that crews need to leave home earlier to achieve their report time and this then effectively reduces their rest period but without that penalty being evident on the roster. Overall, rostering and FRMS is seen as a reactive process that offers little

protection and little evidence of its effect other than to justify company needs. People do not expect every fatigue report to produce a positive outcome, but there is a risk that reports will cease altogether unless confidence can be won through comprehensive and transparent feedback.

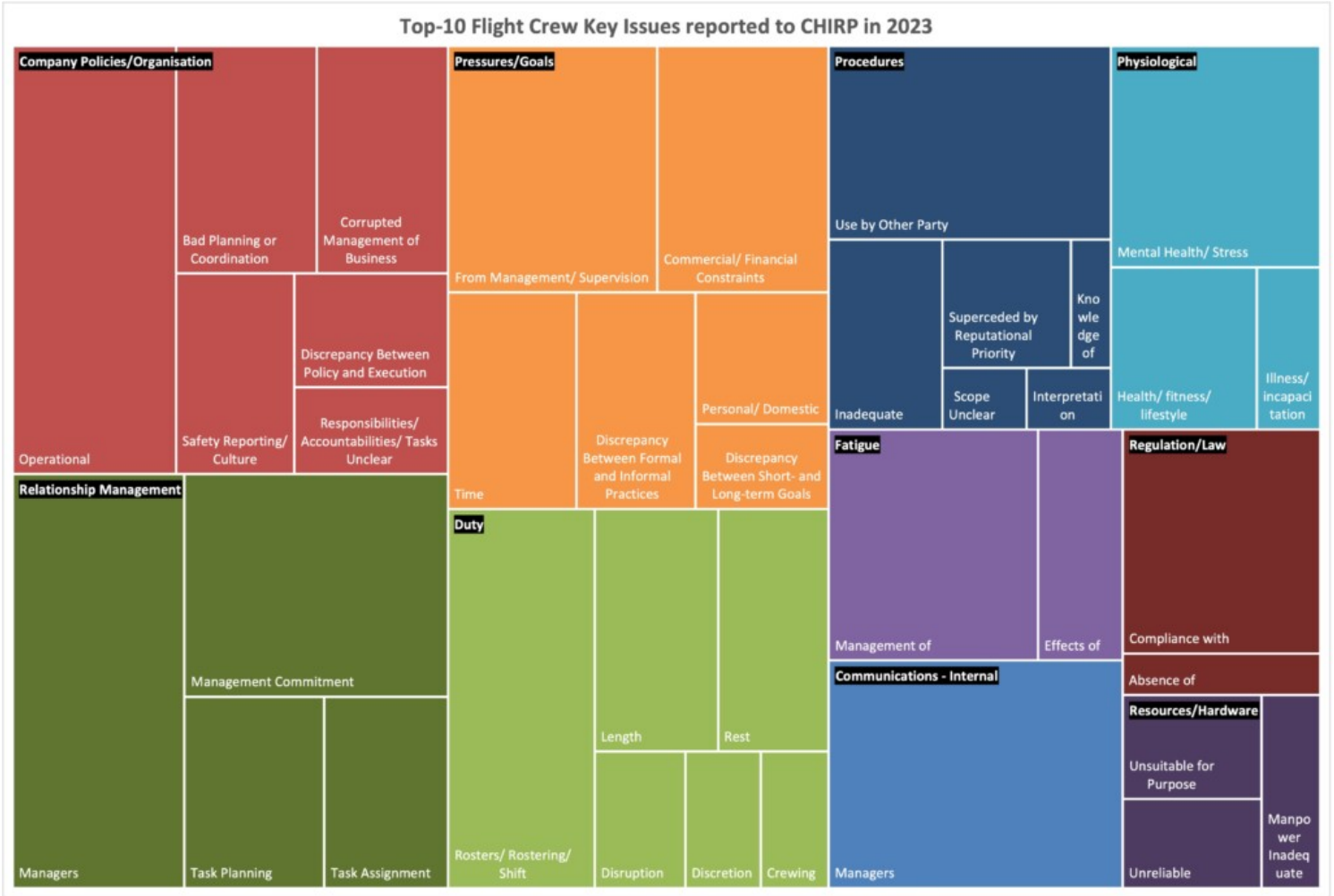
In the [performance-based-regulation CAP 2386](#) approach (as opposed to prescriptive rules-based regulation), there is a risk that commercial pressures may tempt operators to regard FTL numerical limits as an acceptable baseline for rostering and to use one-size-fits-all policies unless the adverse effects of doing so can be measured. It is not *CHIRP's* role to 'solutioneer', but we believe that an alternative approach would be to demonstrate the adverse effects of unfitness to fly and the corresponding commercial benefits of alternative HR strategies. For example, a study by the Norwegian AALB a few years ago correlated self-reports of flight crew sleepiness as measured on the Karolinska Sleepiness Scale (KSS) with FDM data; sleepy pilots had a tendency to fly slower on the approach (down to $V_{ref} - 10$), had more hard landings, were later in decoupling the autopilot, had more fuel at shutdown (i.e. had carried more), taxied more slowly and had a higher fuel burn while doing so. The bottom-line is that there are commercial impacts to fatigue over and above the obvious safety risks and so it may be in the interests of company efficiency to conduct some analysis of KSS versus flight data – who knows, that extra night down-route to offset fatigue may well pay for itself in improved efficiency, operational effectiveness and fewer maintenance/rectification requirements.

Whilst all of the above might appear a bit downbeat and depressing, one glimmer of light on the horizon is that, taking into account *CHIRP's* representations, the CAA have commenced a post-implementation review of the assumptions within the whole UK rostering and FTL/FDP regulatory set so that they can determine whether there are any areas that could be better defined, harmonised or re-evaluated now that we are no longer part of the EASA regulatory regime. At present, they have meetings scheduled with key stakeholders (airlines, unions, etc) over the summer period to get their feedback, with a view to conducting a formal consultation once that feedback has been collated, digested and recommendations have been formulated. We look forward to the outcome of this review as a potential reset and clarification of many parts of the FTL AMC and GM material.

Absence management policies were another frequently reported issue by flight crew. Operators are justified in seeking to discourage inappropriate absences but there are examples of policies that deter personnel from absenting themselves when they are unfit to fly through illness and fatigue. Operators are easily able to measure absenteeism, but *CHIRP* has seen little evidence of attempts to assess any adverse impacts of associated absence policies. Absence management policies should not be devised in isolation; remuneration policies in which a disproportionate element of the package is paid by the flying hour, or pay is markedly reduced when calling in sick, can be disincentives to declaring unfit to operate; job and financial security are powerful incentives to keep flying even when we all know that there is a legal requirement not to operate when unfit to do so.

We must acknowledge that *CHIRP* generally only sees problems reported and there is undoubtedly good practice in the industry of which we have no sight. Nevertheless, on the evidence of what we do see, there can be little doubt that real and perceived pressures may result in many operating when they are unfit to do so or potentially cutting corners to achieve the task. Be reassured, even if we can't publish some reports due to confidentiality requirements, this concern is being relayed to the relevant regulators by *CHIRP*.

Steve Forward, Director Aviation



In Memoriam - Ken Smart

It was with great sadness that *CHIRP* learned that Ken Smart CBE, FRAeS, sadly passed away, peacefully, with his family with him, in early April 2024. Ken had a long tenure as a Trustee in support of CHIRP (2003 – 2013), six years of which he was Chair of the Charity. Ken had a long and impressive career, working as Chief Inspector for the AAIB, a non-Executive Director on the Board of British Airways and tirelessly in support of several charities and many other fields in which he was

active. We at *CHIRP* are grateful for the commitment and support he gave us as an immensely valued member. He will be sadly missed by many working in the aviation and human factors sectors, and we offer his family our deepest and most sincere condolences.

Report to CHIRP!

Reporting to *CHIRP* is easy by using either our [website](#) portal or our App (scan the appropriate QR code shown or search for '*CHIRP* Aviation' – ignoring the birdsong apps that may come up!). In our reporting portal you'll be presented with a series of fields to complete, of which you fill in as much as you feel is relevant – not every field is mandatory, but the more information you can give us the better. Although you'll need to enter your email address to get access to the portal, none of your details are shared outside *CHIRP*, and we have our own independent secure database and IT systems to ensure confidentiality.



CHIRP FEEDBACK Survey



We value your opinion about our FEEDBACK newsletters and associated engagement methods, please spend a few minutes responding to [10 short questions about CHIRP Aviation FEEDBACK](#)

Engineering Editorial

It seems that a reminder of the dangers of assumptions is due, especially with the manpower shortages being suffered throughout our industry. A recently received *CHIRP* report mentions mechanics doing inspections which are signed off by licenced staff. This would apply equally to Part 145 Workshops and Production (Part 21 sub-Part G) organisations where fitters may come under pressure to sign/stamp their work in place of more expensive experienced inspectors.

The last time *CHIRP* Air Transport Feedback mentioned engineering assumptions (trust) was in Edition 140 (October 2021), where a Part 145 A1 approved organisation made assumptions about the staff of a contracted-in Part 145 B1 approved organisation. This incident led to a maintenance error investigation because not only did the customer find an engine system tube support bracket lying in the cowl after return to service, but approval ratings had been crossed. (One aspect of this was Part 145 B rating engineers signing for leak checks for an engine on wing, as opposed to

one hanging in their test cell).

The main consideration about making assumptions has to be that, although you may have worked with certain staff for many years (or once a year for 10 years), from an HF point of view the staff member, perhaps a multi-licenced engineer (without type cover on your aircraft) or a mechanic, may have HF issues you are not aware of on any given day. If their work is not inspected, you have introduced an unnecessary risk to the task/s. Everyone in the industry knows that the B1 and B2 Support Staff are licenced and appropriately authorised to certify base maintenance task cards (and also sign the CRS in the Tech Log for line activities when not in a support staff role). These privileges do not allow delegation of a licenced engineer's responsibilities. An A-licenced engineer cannot delegate any of his line duties, inspections or otherwise to anyone else (or certify in a base maintenance environment). In Base maintenance, it is perfectly acceptable to let your mechanics do a General Visual Inspection (GVI) of a zone on the first day of the Check to give you an early heads up of impending defects, especially ones requiring spares that are not on the parts Pre-Load. Basically therefore, clearing an inspection task card requires an inspection by an inspector, B1 or B2.

Maintaining concentration is essential, you may have driven to work from home and not be able to recall any of that journey but that must never be the way you inspect. If your concentration drifts to other matters in your life, stop moving, pause, consider the other matter to the point where you can safely move on by going back and reviewing the last two (or more) points/stages of the task at hand. This good engineering practice applies to all other interruptions as well we all know. In conclusion, you the Inspector, must still see a representative sample of the work being carried out for Condition Assembly and Functioning. [Reference: [CAP 562 'Civil Aircraft Airworthiness Information and Procedures'](#), 'Condition Assembly & Functioning' at Chapter H, Leaflet H20, Page 2, Paragraph 1.3 (Page 566 of the pdf) and 'Representative Sample' at Chapter H, Leaflet H20, Page 3, Paragraph 1.5 c) (Page 567 of the pdf)].

And finally, a large number of recent CHIRP reports cite management as a predominant issue. A wide list of cover and plenty of experience is an essential precursor to a senior role but should leadership skills training for managers not be required by the regulation? Is the competence assessment of senior staff done in accordance with a rubber-stamped tick-sheet? Does competence assessment become driven by performance above competence? What is a senior staff member's attitude to the regulations, the organisation's Quality/Safety Department, Internal Reporting (and it's requirement for confidentiality)? Would they actively promote *CHIRP* and the reading of our *FEEDBACK* publications? The amount of licence cover and experience does not make a person a good leader and, in a small Line operation, the opportunity to learn from one's peers is less than the help available in a Base operation with peers in double, maybe treble figures. An on-time return to service at all costs may help the bottom line, but an aircraft at the bottom of the ocean is much more costly.

Correction: It has been kindly pointed out that the *CHIRP* Air Transport Feedback Edition 149, January 2024, Engineering Editorial mentioned the BMA (British Medical Association) where the correct organisation should have been the GMC (General Medical Council). Please accept my apologies.

Phil Young, Engineering Programme Manager



