FC5250

Posted on 26.07.2023 by Steve Forward

Category: Flight Crew (Commercial)

Report Title Stable Approach Criteria changed without notifying pilots

Initial Report

At [Airline] we operate using e-manuals which are updated on a daily basis electronically. Periodically we are notified [by notification system] of significant change to operating policy, prior to specific manual upgrades. I attended a recent simulator check and, during the briefing, was informed by the trainer that the Stable Approach Criteria policy had been updated. This was quite a surprise as this is one of the most important elements of our operation, and you would expect this to come via formal notice. The trainer did not know exactly when the change occurred but suggested it was several months ago already. We have now received formal notification of the policy change; however, I know of at least one pilot who unknowingly breached the new policy during this period.

Many of us are concerned at the speed and volume that manual updates occur – the majority of them are small, insignificant and often irrelevant to role. We often only discover policy change through discussions on the flight deck. This also raises the question as to how a change to a fundamental element of our operating policy has slipped through without the chief technical or training pilot deciding / remembering / considering to promulgate formally.

Comment

CHIRP has commented before on the need to have robust policies for a defined cycle of regular changes to documents rather than a series of *ad hoc* updates. The frequency of such updates depends on the nature of the change (routine, urgent, administrative etc) and, in this case, it seems that rational decisions about how to incorporate the changes were unfortunately derailed by an administrative error that led to them not being properly promulgated. One of the purposes of simulator checks is to refresh crews on recent changes and so this fail-safe activity worked in this case but it is concerning that some crews may have unintentionally been operating in contravention to their OM-A because they weren't aware of the changes.

CHIRP is heartened to see that the company is investigating why the administrative error was made, and also why the failure to promulgate was not evident. A change as significant as a revised Stable Approach Policy would hopefully have been considered within the company SMS processes and this should have highlighted the importance of robust promulgation channels. In any such

investigations, it's important to distinguish between errors and mistakes: in 'Just Culture' safety terms, 'mistakes' are symptomatic of people misunderstanding the task and potentially requiring further guidance or training, whilst 'errors' indicate that there are systemic problems that induce people to do the wrong thing. It behoves all organisations to mitigate as many systemic inadequacies as possible so that errors are reduced; in the circumstances of this report, this may identify safeguards that could be introduced to ensure that critical documentation is not lost in the system but properly highlighted to those who use it.

Just Culture & Reporting

Errors, mistakes, violations, sabotage/recklessness

Condition	Action	Deviation	Outcome	Remedy
Error	Unintended	Unintended	Unintended	System review
Mistake	Intended	Unintended	Unintended	Individual training
Violation	Intended	Intended	Unintended	Incident dependent
Sabotage/recklessness	Intended	Intended	Intended	Incident dependent

e.g. Speeding driver

- Driver didn't notice speed limit change due to distraction, gets caught – error
- Driver honestly thought speed limit was higher than it was, gets caught – mistake
- Ambulance driver speeds and accidentally scrapes other car – violation
- Criminal driver speeds and deliberately causes other car to crash – reckless