Human Factors Interventions & Safety Management
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*Note: This generic policy is a sample policy provided in good faith as reference to assist and guide in the development of other Company’s Error Reduction Management Policy.

You are cautioned that this policy is generic and is required to be customized and adapted to ensure a fit to the specific needs of any particular Company’s requirements.
1. ERROR REDUCTION MANAGEMENT POLICY

1.1. Philosophy

{Add company name} is committed to providing safe and reliable airline services. To ensure that commitment, it is imperative that we learn from our mistakes and reduce human error that compromises the safety of our operating environment.

{Add company name} subscribes to the belief that, while human error is simply a part of being human, employee mistakes are a manageable aspect of our business. Through a process of learning, our employees, as reasoned and mature individuals, should work to their maximum reliability with some errors expected. Additionally, when these errors do occur, employees accept the responsibility to report these errors so that we may learn of their contributors and, drawing on that knowledge, prevent accidents.

{Add company name} believes that diligent attention to human factors in error reduction go hand in hand with improved safety and improved financial performance.

1.2. Purpose

The Maintenance Division of {add company name}, in the spirit of “Learning From Our Mistakes”, seeks to actively manage technical human error and enhance system safety through a proactive, systematic approach to identifying technical human error events, determining root causes, and implementing error prevention intervention strategies to reduce the reoccurrence of error events.

This Policy and related procedures are intended to provide the right disciplinary standard coupled with an affirmative duty for all staff to report technical human error event(s).

The intent of this policy is to achieve and sustain a safety partnership that will reduce technical human error through programs that foster a just, fair, and professional culture. To encourage incident reporting and investigation utilizing human error events as learning tools, the Air Nova Maintenance Division shall implement:

a) a Human Factors Awareness Orientation Program,
b) a fair and just Discipline System that supports system safety;
c) a No Fault Assurance Technical Human Error Reporting Process,
d) a structured human factors based Investigation Process,
e) a management supported Corrective Action Process,
Sample
Error Reduction Management
Program Policy

f) a metrics process to track the performance of corrective action, and
g) a feedback awareness process to ensure results are communicated to the frontline employees.

In support of Error Reduction and the Corporate Safety Policy’s requirement to “provide systems and processes within the Organization to promote, measure, access, and follow-up on safety issues”, the Maintenance Division shall operate using a Safety Management System that includes the following elements:

a) Safety Management Policy and Principles,
b) Safety Assurance Documentation, and
c) Risk Management Methodology.

1.3. Scope

This policy limits the circumstances under which discipline is imposed for actions resulting in technical human error events arising from staff in the Maintenance Division.

1.4. Statement of Authority

This policy is issued under the authority of the Vice President of Maintenance and shall be maintained by the Human Factors Safety, Manager.

1.5. Discipline

Under the terms of this policy, disciplinary action will not be taken against an employee for a technical human error.

Discipline would be permissible when:

a) The employee’s actions involved violations of {add company name} Health and Safety Policies; or

b) The employee has been reckless, as determined by the Culpability Review Board that the employee consciously disregarded increased risk constituting gross deviation from standard care; or

c) The employee has committed a series of technical human errors that indicate a general lack of care and professionalism as determined by the Culpability Review Board; or

d) The employee’s actions involved criminal conduct.
Note: Any disciplinary action taken shall be in accordance with the Human Resources Corrective Discipline Policy.

1.6. Responsibilities

Commitment to the philosophy of this policy is the joint responsibility of the Executive Committee, Vice President of Maintenance, all Maintenance managers, and all Maintenance employees.

Affirmative Duties

*The Erring Employee* Each Maintenance employee has an affirmative duty: to report his/her errors, to openly and honestly participate in error investigations, and to actively participate in the development of error prevention strategies.

Technical human error event Classes that require reporting & investigation are:

1. Any human error-caused equipment discrepancy that could have or has made it onto an aircraft dispatched into revenue service (e.g. oil cap not installed, check valve installed backwards).
2. Any human error-caused discrepancy on a safety critical system that has been identified by inspection or test.
3. Any error that an employee has made and that the erring employee feels that an investigation would aid our flight safety and error reduction effort.

*The Vice President of Maintenance* is responsible to champion the human error management program and direct the implementation of systemic error prevention intervention strategies to prevent the error reoccurrence.

*The Manager, Human Factors Safety* is responsible to Manage the human error reporting, human error investigation, and human error analysis process, and maintain functional direction and control of the Culpability Review Board and the Event Review Team.

*The Culpability Review Board (CRB) Chaired* by the Manager, Flight Safety or in his/her absence a designated alternate; is the independent appeals board whose sole function is to ensure that all disciplinary actions taken, are within the discipline guarantees made through this Error Reduction Policy (item1.5). The CRB is governed through the administration of the Culpability Review Board Governing Procedures.
The Processes & Human Error Event Review Team, Chaired by the Manager, Human Factors Safety, and comprised of the Manager, Quality Group and other members as appropriate, is responsible to the V.P. Maintenance to facilitate the generation of systemic corrective action intervention strategies to prevent the reoccurrence of the human error(s).

The Manager, Quality Group, is responsible for tracking the timely implementation of all recommended corrective action and intervention strategies to prevent the human error reoccurrence.

The Maintenance, Managers, Supervisors & Crew Chiefs are responsible for supporting the investigation of errors, determining corrective action to prevent errors and implementing strategies to reduce error, and; to ensure that the employees they supervise that do commit technical human error(s), for which no discipline was imposed, receive adequate training, supervision, and evaluation to prevent reoccurrence of the error(s). This training and evaluation shall be documented.

1.7. Related Publications

a) Human Factors Awareness Orientation Program Control Manual
b) Culpability Review Board Governing Procedures
c) Maintenance Error Reporting Procedures
d) The Maintenance Error Decision Users Guide
e) Corrective Action Feedback/Awareness Control Procedures
1.8. Glossary of Terms

Reckless Disregard for Flight Safety – involves a determination by the CRB that the subject employee consciously disregarded the fact that his/her conduct would significantly and unjustifiably increase the risk that the technical human error event would occur. The risk must be of such a nature and degree that, considering the circumstances known to the employee, its disregard involves a gross deviation from the standard of care that a reasonable employee would have taken under the circumstances.

A General Lack of Care and Professionalism – arises from a series of technical human errors and involves an objective determination by the CRB that the subject employee should have known that his/her conduct significantly and unjustifiably increased the risk that the technical human error event would occur. The risk must be of such a nature and degree that, considering the circumstances known to the employee, its disregard involves a gross deviation from the standard of care that a reasonable employee would have taken under the circumstances.

Technical Human Error Event – mishap; an unintentional human error by an employee or employees that compromises the safety of our operating environment, aircraft airworthiness, or causes economic harm unacceptable to the Organization.