

The practices-procedures gap

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WITH THE ADVENT of 'systems based auditing', aviation companies have been keen to put down words about procedures that please the regulators and client auditors. Documents such as the IOSA Standards Manual documents are what IATA thinks should be in place in the airline environment. The ICAO Safety Management Manual, (Doc 9859) sets out the ICAO opinion of what a safety management system should be.

Well-rehearsed regulators and client auditors read the IOSA and ICAO documents and interpret them for developing an audit on aviation organisations. The BARS program is an example. Regulators and client auditors make recommendations to aviation organisations that the aviation organisations are expected to incorporate into their procedures. An example is when CASA requires an organisation to incorporate a particular procedure detailed in the company Operations Manual in a particular way. In many instances the procedures are the only things that get changed while the practices remain the same.

The documented systems are the mitigators for identified risks within aviation organisations. These include but are not limited to the Safety Management System, the Company Security Manual, the Operations Manual and the maintenance organisation's Procedures Manual.

An astute auditor compares what is in the documentation against what happens in actual practice.

As auditors, we are finding significant gaps between

documented procedures and practices. For example, we find documented induction procedures for new employees that are exhaustive. However, the procedures are quickly compromised when there is pressure to get a new pilot on line as quickly as possible. Another example is where pilots sign the operations manual annually as having read and understood the document but have not even opened it.

On the maintenance side we are finding procedures manuals that have been recently written and approved by the regulator (albeit with varying standards between individuals in the regulator) but do not produce maintenance outcomes that are anywhere near best practice. It gets worse. Because the documented procedures don't reflect the reality of practice, the risk as-



An audit needs to look beyond the documented procedures to how those procedures are translated into practice.

There needs to be some provision for innovative practice. There also needs to be consideration of standards in an organisation as fitting the type,

location and style of the operation. assessment process which cite system procedures, is no longer valid. This is how bad organisations achieve accreditation to certain audit standards, but have safety practices that produce accidents with the risk of multiple fatalities.

In summary, the practices need to match the procedures of an organisation so the identified risk mitigators are valid. Without a match between documented procedures and practices, the whole safety management concept moving towards a generative safety culture fails.

How do we measure the procedures-practices gap?

The procedures-practices measurement documents the difference between what an organisation says it does and what it actually achieves in practice. It

is the ultimate spin detector. The process will look at documented procedures compared with what happens in practice. Yes, this is product checking. This is where industry experience is essential in conducting audits along with a keen nose for when operators are trying to pretend they are something they are not. It is easy to document procedures to ICAO or 'best' standards, but much more difficult to practise them all the time.

The practices part of the equation is considerably more difficult because there is no set definition of best practice. Best practice is constantly being revised by improving technologies. To establish the best practice model, we need to look in a variety of organisations and pick out the practices that meet the best safety outcomes.

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In determining the best outcomes, we need to use the journeymen of aviation. We need to put together diverse teams of people who have complementary skills, so that we can cover the full spectrum of the aviation business.

Where does best practice come from?

Procedures that are developed through a risk assessment process by people actually doing the activities are probably the most efficient in terms of doing exactly what we need a procedure to do.

However, this approach is often at odds with the regulator's ideas of what fits in their policy framework and particularly their idea of what should constitute an Operations Manual or Procedures Manual as the case may be. At the entry control stage, operators have no option but to comply with the CASA AOCM, but many of the procedures contained in this document are for the convenience of CASA as distinct from addressing any of a collection of documented, known risk factors.

CASA has indicated over a number of years that they are very willing to accept 'risk-based' standards. Very few organisations have been in a position to identify the risks and define their standards according to a risk assessment process. Procedures based on current risk assessment should be vastly more efficient than those that have been developed through a series of opinions espoused by regulators. We are yet to see a regulator sufficiently familiar with risk assessment processes, and at the same time adequately familiar with a particular activity, to make informed decisions about the risk based standards.

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