



A **Safety policy** is a requirement for any SMS, and while it does not guarantee a successful SMS, it goes a long way to set the tone of what is expected **if** it is done right and **if** employees are convinced to take the policy seriously. The Safety policy is a vast step up from the original “Safety First” sign over the hangar door, although its intent is the same. The policy should start with a general statement that the company is committed to Safety. From there it will spell out what management’s responsibilities are. By that I mean, management must

commit to providing a Safe place to work, where the equipment will be maintained in a Safe condition and all the necessary personal protection equipment will be provided. They will commit to providing training on how to Safely carry out assigned duties, as well as provide a mechanism to report any hazards.

The responsibilities then move down to the employee. The policy must spell out that Safety is **EVERYONE’S** responsibility. While one is not supposed to let their emotions enter into an accident investigation, I remember a five fatal accident up North that, like so many, did not have to happen. The pilot of a float equipped aircraft had crashed trying to take off from a small lake, killing all on board. Search & Rescue had found the wreckage and confirmed five black (dead). While waiting for others to arrive before going to what would be a grim wreckage scene, I talked to the owner who indicated the pilot was very experienced and in his mind a Safety conscious person. As the pilot had self dispatched very early that morning I asked if anyone was around when he left. He indicated that the janitor was, but was likely sleeping after his night shift. I indicated I needed to talk to him prior to going to the scene. He was called in and the first thing he said to me was, ”I knew that was going to happen one day.” When I asked just what he meant by that, he said that the pilot was drunk or at least hung over. How did he know that? He had seen the pilot like that before and that morning he had gone and sniffed on an oxygen bottle in stores before taking off. Toxicology would later indicate he still had a blood alcohol level of 0.05 at the time of the crash. We would later determine that he had failed to raise the flaps from landing to the take-off setting. That was a fatal error on a short lake. When I later asked the janitor why he said nothing to the unknowing owner, his reply was the same as the one in the cartoon: “IT IS NONE OF MY BUSINESS.” I had to bite my tongue to resist telling him that it damn well was and his inaction contributed to the deaths of those five people. Therefore, a Safety policy **MUST** spell out in no uncertain terms that **SAFETY IS EVERYONE’S Business**. To me that is the most important message in the policy. Attached is a Safety policy used by Qantas since 1964 that, I believe, had it been in place there and enforced, would have gone a long way in saving those five people’s lives.



We have it imprinted in our workbook as a model of a Safety policy that covers all the necessary bases except the just culture when reporting hazards. If you don't recall what a just culture is, go way back to article #4 - March 2015.

This important segment of the policy must state that except for willful reckless errors, no discipline will be applied to reported errors even if they result in damage. This just culture statement will be covered in greater detail in the next article.

One should never simply copy someone else's policy, but it can make an excellent basic template to model. I hope that the attached one is large enough to read. If not, let us know and we can add it to our website. Some basic rules when developing your Safety policy are:

- 1) Keep it to one page and be as simple as possible.
- 2) Include everyone's responsibilities, starting with management.
- 3) Include a just culture statement that informs the readers that there will be no discipline for reported honest mistakes.
- 4) Work to tie it to your company, as was done in the second example
- 5) It should complement and certainly never contradict your mission statement.
- 6) It is management's responsibility to develop the policy.
- 7) The accountable executive must sign the policy, but I've seen policies where the entire management team had signed.
- 8) All employees need to receive training to ensure they understand the importance of the document and their responsibilities.
- 9) It must be prominently displayed everywhere.
- 10) It must be enforced.
- 11) It needs to be reviewed on a regular basis.

What you don't want is a Safety policy hidden as a page in a manual.

The following is one of the best Safety policies I have ever seen and certainly one of the best for display and use. If you are able to read it, you will see that it follows the outline of Qantas' 1964 policy, but it has been personalized and printed on a 24" x 36" poster for framing.

I remember in the 90s we were trying to convince companies to at least provide human factors training for their maintenance personnel. We offered, and still do, to provide an overview of just what it consisted of and why they should invest in the training. We still do, as then, provide this service for costs only. A small feeder airline took us up on the offer.

The CEO, DOM and even a few board members gathered in their boardroom. When we came to Safety policy I asked if they had one, to which the CEO proudly replied “yes”. I asked to see it and he sent the DOM to get it. I continued with the presentation until about 10 minutes later the DOM returned with a standard 8.5” x 11” sheet of paper with **Safety Policy** in black written across the top. I asked him where he found it, to which he hesitantly replied after the CEO nodded his head: “behind a bunch of notices above the Xerox machine.” On the boardroom wall was their mission statement on a wood plaque with gold letters. I then made the point that the Safety policy was of far greater importance for the survival of the company than the mission statement and should be seen everywhere. This illustrated Safety policy could not be hidden. It was throughout the company and Dan, their president, would even bring his clients up to it to read, and explained that even they had a role to play in Safety. In fairness to the commuter airline, they updated their Safety policy, begin doing HF training and added the following to their passenger briefing: “If anyone has a Safety concern, please bring it to the attention of one of the flight attendants.” Safety is **everyone’s** business. Now for a few Gap Analysis Phase 2 Safety Policy questions.



1. Do you have a Safety policy?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_ CA stands for Corrective Action \_\_\_\_\_
2. Does it outline management’s responsibilities?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_
3. Does it outline the employee’s role in making it successful?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_
4. Does it include a statement regarding fair treatment when reporting one’s own errors or near misses? (Just Culture)
5. Is it signed by the accountable executive?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_
6. Is it prominently displayed?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

7. Do the employees know what it says and believe that Safety is everyone's responsibility?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

8. Is there provision for a periodic review?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

9. Is it being enforced?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

10. Is there a readily available, simple reporting system for hazards?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

11. Do ALL employees understand their role in using the form?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

12. Are corrective actions being taken and recorded?  
Yes \_\_\_ No \_\_\_ Partial \_\_\_ CA (If required) \_\_\_\_\_

Check and work with your regulatory body, which likely has a gap analysis checklist that may require further steps. You now have the foundation for a successful SMS. The next step will be to say how you are going to do it and do what you said you were going to do.