

**Consultation: 'Safety First': A Strategy for Human Factors in Civil Aviation**

Consultation Period: 30 April 2013 to 5 August 2013

**Consolidated Response Document**

**Summary**

This document contains the consolidated response to comments received to IN-2013/113 regarding the UK Strategy for Human Factors (HF). In line with the Information Notice it was not the intention to create a detailed comment response document. However, this document has been written to highlight the topics raised and describe how they have been incorporated in to the updated strategy.

Comments regarding the HF Competencies and HF One-year plan have been noted but do not form a part of this response.

Comments were received from:

|                                    |  |
|------------------------------------|--|
| ADS                                | NATS   |
| Argent Risk Management Consulting  | PIPP UK  |
| Baines Simmons                     | QinetiQ  |
| BCT Aviation Maintenance Ltd       | Royal College of Physicians                        |
| Cabanito                           | School of engineering and<br>Mathematical Sciences |
| CMAC Consultancy Ltd               | Symbiotics Ltd                                     |
| Coventry University                | Systems Engineering and Assessment<br>Ltd          |
| Glasgow Prestwick Airport          | Unite  |
| Heathrow Airport                   | 6 Private Individuals                              |
| Highlands and Islands Airports Ltd |  |
| Level Head Coaching                |  |
| Light Aircraft Association         |  |

The CAA thanks contributors for their comments and for the interest that they afforded to this consultation.

**Introduction**

Since the original submission of the strategy for human factors there have been several important changes to the structure of the CAA. Firstly, the merger of the Safety Regulation Group and Department of Airspace Policy to form the Safety and Airspace Regulation Group in July 2013 and more recently the formation of the department of Intelligence, Strategy and Policy (ISP). The new structure gives a renewed commitment to HF with an updated HF strategy written to set the direction of future and ongoing programmes.

## **Strategy Foreword**

The foreword has been updated with Group Director Mark Swan's commitment to the HF programme. The strategy as a whole has been reviewed to give more focus and clarity in the areas which respondents requested. The document still maintains its intended function as a long-term vision, supported by shorter term actions, and will be followed by one-year and three-year action plans. The action plans will outline the work being done to fulfil the strategy and how we will progress in the future.

## **HF in Safety Management Systems (SMS)**

Positive comments were received which supported incorporating HF within SMS. This task is a priority for ISP and work has begun on developing documented processes to support this integrated approach. This has been clearly outlined as an action point in the revised strategy.

## **Timeframes**

Questions were raised over specific dates mentioned within the document. It was suggested that the strategy should be a 'timeless' document with specific timeframes outlined within a supporting action plan. We have amended the document to remove specific dates and will be developing action plans to deliver the intended outcomes of the document. The strategy will be updated through periodic review to reflect our progress and delivery.

## **Regulation and Enforcement**

There was confusion among some respondents as to whether the strategy was outlining further regulation and what the strategy was mandating. Others queried how the strategy would be adopted if it was not part of regulation. This input has been accepted and the strategy has been updated to clarify that it is not regulation and reinforce the objectives of the document.

## **Objectives, Measurements and Monitoring**

Some correspondents felt that the strategy does not provide specific objectives or measures and seems to lack detail in these areas. Others suggested that various examples should be given across domains/communities. While the strategy is intended to give a high level direction it was accepted that more tangible action points would help to clarify the objectives of the document. Specific details will be included in the future action plan as it is developed and published.

## **Crew Resource Management (CRM)**

There were several comments asking about the future of CRM instructors and the quality of CRM instruction, including the use of online CRM courses and computer based training. This is to be specifically addressed within an amended version of CAP 737 and related Information Notices. It is recognised within the strategy that training should be relevant and delivered in a suitable manner and not reduced to a tick-box exercise. Facilitation is outlined as the primary means of delivery for HF training.

## **Community Focus**

Some correspondents suggested that certain communities were underrepresented, due to the lack of specific mention within the document. It is important that all communities and domains feel that they are equally represented as the strategy aims to give benefit across aviation as a whole. We have changed the document to make it more applicable to all communities while understanding that the actions should be applied in a proportionate manner to the activity being undertaken. The intent of the document is to represent the aviation community as a whole, from initial design to private flying.

## **Points of Contact**

It was accepted that the strategy requires better defined points of contact for HF and specific domains within the CAA. These contact details are to be made more accessible as part of a future update of the website and this commitment is made in the strategy.

## **Industry Engagement**

Further engagement with the industry was requested in the form of HF road shows and seminars both within and outside the aviation community. Engagement such as this is welcomed and has already resulted in a successful workshop in partnership with NATS focused on HF issues in automation.

We feel that the most effective way of maintaining engagement with HF initiatives is to develop a network of external contacts rather than hold specific HF standing group meetings. The intention is that this broader network of contacts can be brought together by the CAA to discuss specific HF areas of development. We will continue to be involved in external HF working groups such as the Royal Aeronautical Society HF group and the European Human Factors Advisory Group.