BREAKING THE RULES

By John Barrass

John Barrass is an experienced aviator who served 20 years with the Royal Air Force and Canadian Forces in a variety of command, instructional and flying appointments. On leaving the military, John became Manager Air Safety for ERA. Now an established independant flight safety consultant, John has worked on a number of EUROCONTROL initiatives notably the Level Bust and AGC safety improvement initiatives..

Controllers and pilots are the last line of defence, but they should not be the only line of defence. In this article, John Barrass explains how breaking the rules can sometimes be the safest option for controllers and pilots faced with situations that the rules were not designed for; situations that could perhaps be avoided with better communication and greater acceptance of responsibility by all concerned.

Standard Operating Procedures (SOPs) are there to ensure the highest standards of safety and efficiency. They are the result of years and years of corporate wisdom handed down from one generation to the next. SOPs ensure that standards are maintained across an organisation, they make it easy for someone to move around within an organisation, and they reduce the risk of misunderstanding - for the same reason that we continually highlight the importance of standard phraseology. However, SOPs cannot cater for every eventuality and cannot anticipate every situation that a controller or pilot may face. This is why we still have humans on the flight deck and in front of radar screens - humans are very good at dealing with the unexpected.

When a situation occurs which is not covered by SOPs, or for which SOPs are inadequate, then the pilot or controller makes judgements about the right action to take in order to manage the risks. Here is a military example from 1992:

"We were unloading in Sarajevo when I started to see puffs of dirt flying up around the runway. We didn't hear any noise but we guessed it was mortar fire. The captain ordered the rear crew to complete the unloading and immediately started to taxi as soon as the unloading ramp was clear of the ground. He called for everyone to complete their own checks and call ready for take-off. No formal checklist reading, just a call of flaps 50%, trims neutral, and we rolled down the runway. When we landed at our destination, the captain called for the full checklist and pointedly made sure that we did everything by the book"

Thankfully the above example is extreme. Most situations encountered by controllers and pilots are far less dramatic, but it highlights the point very well. In an ideal world, when you encounter a situation which is not covered by SOPs, you seek advice from the appropriate authority - that could be the company management, national aviation authority, manufacturer, etc. In that ideal world, a new or revised procedure would be developed.

In the real world, things are a little more complicated; the pilot or controller has to deal with the situation before he can ask the advice of a superior authority. He or she does the best that they can under the circumstances, using their judgement and drawing on training and experience.

Here is a slightly different example:

"At peak times I have to keep separation distances at the minimum. Inevitably, sometimes, the separation is just under 3 miles, maybe 2.8, but it's safe enough. That's the price I pay for getting them in; if I let the separation exceed 3 miles on a regular basis then I end up with a backlog in the stack - nobody would thank me for that would they? And if I end up diverting aircraft because of fuel shortages, then I've made a safe situation less safe."

What is this controller saying? Is she saying that it is OK to break the rules? Doesn't she care about safe separation of aircraft? Well no, she isn't saying that. What she is saying is that, in certain circumstances, it is in the interests of the overall safety of a situation to break a rule. She is making balanced professional judgements based on her experience and knowledge in order to
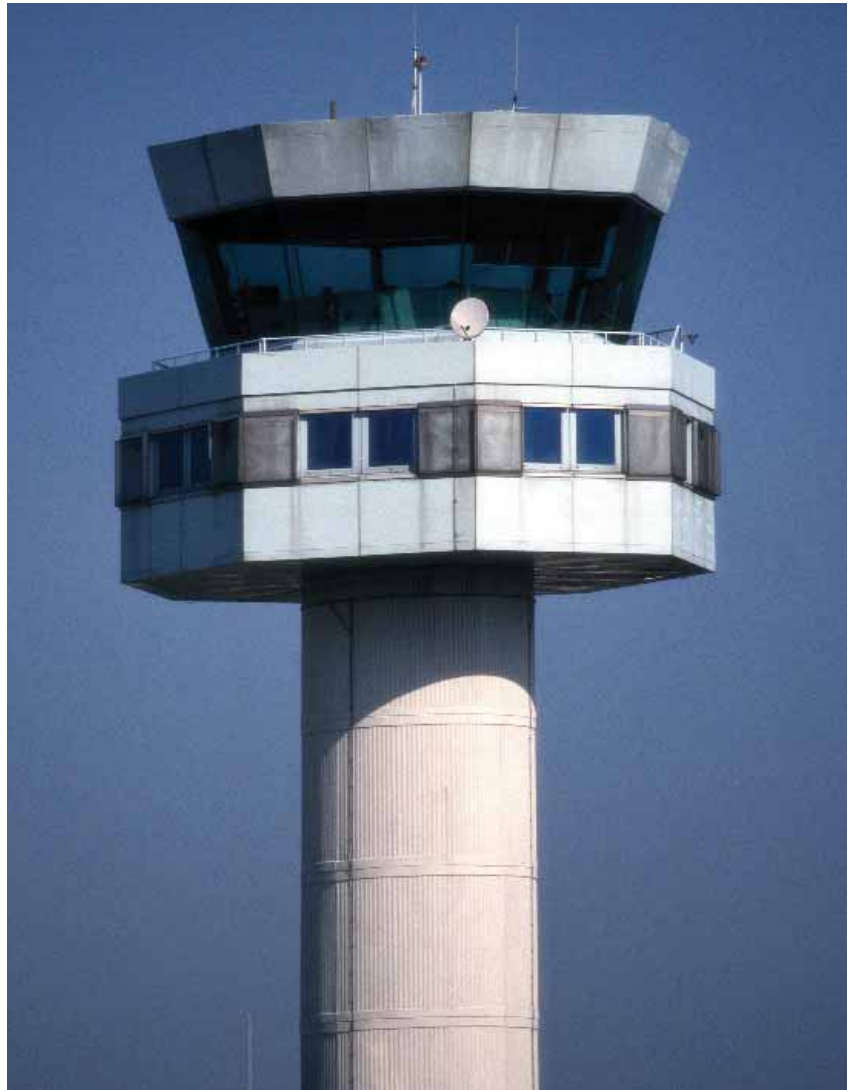
ensure that all the risks inherent in a difficult situation are reduced as far as is possible at that moment.

What is more worrying is that she appears to be placed in this situation on a routine basis. The real problem with the situation described above is much deeper than questioning the professionalism of the controller. In this case the professionalism of the controller is masking the true problem. It isn't a matter of the SOPs or regulations being wrong or inappropriate; the controller should not have been placed in this situation in the first place. Why was the controller placed in this situation? Is it of her own doing, as a result of lack of concentration or inexperience perhaps, or is she placed in this situation as a result of the actions or inactions of others, such as her superiors or the airport management?

Responsibility lies at all levels and relies on communication and an open safety culture. Planners must consult controllers, and consider the implications of their actions, such as the reality of scheduling to full capacity. Controllers must also highlight to management when they are being forced into situations where they are forced to break rules in order to maintain safety, and managers must listen and have the courage and determination to act to address these issues.

Without communication, and acceptance of the risks that come with change, several things can happen - none of which are safe.

If controllers are forced to adopt non-standard procedures in order to maintain safety, and that situation is not recognised or acted upon by management, then those non-standard procedures may become the norm. Over time, with changes of staff and management, and loss of corporate wisdom, the understanding of why those non-standard procedures were developed is lost and procedures can become viewed as entirely optional - a situation of anarchy is the result, and risk is effectively ignored.

Our leaders need to be able to recognise change, acknowledge risk, and act to mitigate the risks associated with change.

KEY SENTENCE:

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