

Dr. Robert Baron is the President and Chief Consultant of [The Aviation Consulting Group](#). He performs extensive work in his core specializations of Human Factors (HF), Safety Management Systems (SMS), Crew Resource Management (CRM), and Line Operations Safety Audit (LOSA). He consults with, and provides training to, hundreds of aviation organizations on a worldwide basis.

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Is Your Safety Policy Truthful?

The following safety policy is fairly representative of a safety policy you might see at any aviation organization. Take a look at it and then I will continue the dialogue below.

Safety Policy Statement

The XXX Safety Policy directly reflects the company's commitment to safety in the workplace, operations, and a positive safety culture. This policy applies to all personnel and every aspect of the company's activities.

XXX utilizes a Safety Management System ("SMS") to reduce risk of injury to personnel, to prevent accidents, minimize damage to equipment and property, and to work proactively towards identifying and reducing the existence of hazards and/or risk in the workplace.

It is XXX's corporate policy to identify and comply with all applicable federal laws and regulations regarding safety in the workplace. XXX strives to incorporate aviation industry "best practices" concerning safety and provides each employee with a safe and healthy working environment. Safety and risk analysis is an integral component of all company decision making processes.

The Accountable Executive is Mr. XXX who is President of XXX. As Accountable Executive, Mr. XXX is responsible for all operations and activities authorized under the certificates, and accountable on their behalf, for meeting the requirements of the Federal and local Regulations. The SMS Program is managed under the Accountable Executive's authority by the SMS Manager who reports directly to the Accountable Executive.

No single person in the company holds veto power in matters which require a group approach to ensure a safe work place.

Every employee is required to take both a proactive and preventative approach to safety. Every employee must take steps to immediately mitigate hazards where the need exists and to report the hazard or incident through the appropriate company reporting procedure.

Disciplinary action shall not be taken against an employee who acts to prevent an injury or who reports any accident, incident or hazard. All employees are required to abide by the standards and procedures set forth in the Safety Management Manual.

Elements such as illegal activity, negligence, acts of willful misconduct, or undue care and attention, shall be considered to be outside the scope of this Policy and shall be dealt with in accordance with the company's "Standards of Conduct Policy".

A safety policy—typically one page—is an implied contract between Management and employees. It should be conspicuously posted in various parts of the facility as a reminder of “how the company does safety”— signed by the highest level manager (typically the CEO or Accountable Executive).

At face, these policies look great, but sometimes they may not be telling the truth. As a global aviation SMS consultant, I have seen numerous occasions where the Accountable Manager (who signed the policy) couldn't recall even one point on the policy. In other cases, management might operate contrary to what is specified in the policy. For instance, a manager not wearing safety goggles or hearing protection in an area where these safety items are required would contradict Paragraph 6. The manager is not only violating a rule, but is also setting a bad example, or negative role modeling. This may create a negative NORM. Another example would be if employees are being reprimanded for reporting unsafe conditions, which contradicts the penultimate paragraph in the above policy.

Here's the problem. If the safety policy is just eye candy, then employees will have a lack of trust with management. If trust is lost, it is a very difficult thing to get back. Employees will stop reporting. Safety will be degraded. Your company's entire SMS will be negatively impacted.

Is YOUR Safety Policy truthful? If so, that's great! You probably also have a good safety culture. However, if your company's Safety Policy is not truthful, then...well...maybe not so much!