



together4safety

Maintaining safety focus during the COVID-19 pandemic

V.1.0 – 8 October 2020

Collaborative guidelines produced by EASA Together4Safety

1. Purpose

The guidelines provide a list of considerations for organisations to maintain their safety focus during the ongoing pandemic. The issues addressed in these guidelines are not exhaustive, and complement the organisation's safety risk management system (as part of its management system).

2. Applicability:

Air operators, air traffic management (ATM)/air navigation service (ANS) providers, aerodromes and ground handlers, approved training organisations (ATO), national competent authorities (NCA).

NOTE 1: For organisations that are not required to have implemented a (safety) management system, it is recommended that they take note of these guidelines and apply elements as appropriate;

NOTE 2: Air Operators should also refer to the guidelines developed for operators: "[Role of operators' Management System in COVID recovery phase](#)". The guidelines include three scenarios that have been published at various dates;

NOTE 3: For the oversight of air operators and ATM/ANS providers, [the NCA should consult the papers below](#), which have been published on the MAB/TeB sharepoint site.

- "The oversight of operators' management systems in the COVID-19 recovery phase, issue 1, 07 July 2020", and
- "The oversight of ATM/ANS-provider management systems in the COVID-19 recovery phase, issue 1, 16 July 2020".

3. Recommendation(s):

- To ensure the continuity of safe and effective operations during the pandemic, it is recommended that organisations consider the content of this document and its applicability to their own activities. It is important to identify risks and hazards, to mitigate them effectively, and monitor how the mitigations work in practice so that the organisation's management system delivers as expected.
- The organisation's senior and accountable managers are reminded of their responsibilities and accountabilities. The senior management should include safety risk management in their decision making process by following the "management of change" principles and remaining vigilant during the different stages of the pandemic.
- At the authority level, the NCA should give priority to oversight activities of the management system, the management of changes, and compliance monitoring.

4. The safety challenges created by the COVID-19 pandemic

EASA's [Review of Aviation Safety Issues Arising from the COVID-19 Pandemic](#) identified challenges that the COVID-19 pandemic may create for organisations in the management of safety, set against a challenging operational and business landscape.

Resuming operations while ensuring economic survival may reduce the emphasis on human and organisational factors. The pressure on finances also means that safety staff may have been made redundant or furloughed at the very time when their expertise may be needed to support safe operations and manage the changes that the organisation may be going through.

Safe operations during the crisis should be managed according to the principles of "[management of change](#)" to prevent unintended degradation of the organisation's (safety) management system. This can further escalate into unsafe operations ranging from small deviations from safe practices to

catastrophic outcomes. In addition, the organisation may have to adapt its resources dynamically, depending on which stage¹ of the pandemic the organisation is managing.

5. Items for consideration to effectively prioritise safety during COVID-19

To avert these safety concerns, close attention should be given to the following controls:

Policy, responsibilities and operational decision-making by senior management, that are specific to the organisation

- The continued importance of safety should not be overlooked, even in times of conflicting interests, low traffic and extreme financial pressure;
- Flight safety and safety of operations remain a priority among other aspects such as image, business, etc. Senior management should take actions thereof and adequately communicate to the staff;
- The senior and accountable managers of aviation organisation are reminded of the relevance of the management system (hazard identification, risk management, [management of change](#), auditing and compliance, safety reporting, and safety performance). Listening to the safety department's and operational staff's safety concerns in decision making is increasingly more relevant under these circumstances;
- Promotion of a positive safety culture that embraces safety and compliance as a key part of supporting , the Accountable Manager and senior management to ensure safe and effective operations, are essential during the recovery phase and after. No action will be effectively implemented without agile² and visible leadership.
- Senior management should actively promote and support the just culture policy within the organisation.
- Considering the dynamic nature of the pandemic, the safety board (or senior management) should regularly meet to timely review the acceptability of the risk levels, level of sufficient resources, and take appropriate safety actions thereof, adapting priorities and strategies.
- The senior management should be mindful that human performance might and will be impacted, due to reduced skills in combination with less staff, additional workload, stress, fatigue, etc. Thus senior management should recognise and accept that more time should be allocated to enable the proper execution of tasks, depending, however, on the criticality of these tasks. For aviation personnel fatigue aspects in the context of COVID-19, including "well-being" aspects, additional material will be available on the [EASA Together4Safety Air Ops Community Site](#).
- Measures should not only focus on the impact of short-term cost reductions, but they should also consider mid- and long-term needs such as training and investment in equipment.

Management system processes and procedures.

- Effective processes and procedures should be continually adapted to changing situation, then maintained and followed.

¹ See chapter 3 of <https://www.icao.int/safety/SafetyManagement/Pages/COVID-19-Safety-Risk-Management.aspx>

² **Agile leadership** is the craft of creating the right context for self-organisation. An environment where agile teams collaborate, learn from each other, get quick feedback from users and are focused on quality and continuous learning. He or she doesn't micro-manage the people nor creates total freedom. Balancing between a less organised approach and a strict structure. Developing and maintaining this right environment is often hard work. With focus on *culture, ownership, mindset, feedback and long term goals*.

- A just culture environment should be implemented and reinforced thereby making employees sufficiently assertive to say 'No', 'Stop!', to communicate and report concerns involving colleagues and managers, customers and sub-contractors.
- Reporting identified, degraded safety levels should be encouraged without the fear of reprisal. Increased vigilance is necessary in all activities since protective barriers can be weakened by the COVID-19 crisis.
- Effective, two-way and regular communication on the organisation's safety policy, compliance with organisational processes, and the use of checklists should be provided. Communication of safety issues should be promoted.
- Risk assessments developed before the pandemic may no longer be adequate due to the changes driven by the pandemic and may need to be re-visited. [Refer to the material on EASA Together4Safety Air Ops Community Site about Safety Issue SI-5008.](#)
- Regulatory exemptions should be carefully managed and the safety impact should be assessed. Extension of exemptions as well as the compounding effect of multiple exemptions should be carefully evaluated (e.g. pairing pilots lacking recent flight experience or engaging an aircraft just fresh from de-storage is unlikely to be a safe strategy).
- Cross-checks for systemic risks in the organisation should be applied, taking into account the risks/safety issues that existed prior to the pandemic. The goal should be to identify unnoticed items or errors in risk assessments and to react as quickly as possible to adapt safety barriers.
- High risk safety issues that existed prior COVID-19 pandemic and are still applicable during the pandemic should be addressed.
- An increased use of double-checking/counter-signing, traceability of information given should be considered.
- When an automatic data collection tool, such as a flight data monitoring (FDM) programme, is in place, it should be used to monitor deviations from the SOPs. In addition, an FDM programme could be used to:
 - Automatically generate individual FDM reports for flight crew members to maintain their vigilance;
 - Request a retrospective flight crew report after every significant risk-bearing incident detected by the FDM programme.
- Supervision of contracted activities that can influence safety (e.g. maintenance, ground handling, flight support, training, etc.) should, as a minimum, be maintained in order to ensure that safety standards continue to be met and the ultimate responsibility for safety of the contracting party is satisfied. When the availability of these contracted activities is eroded, the consequences of doing so should be correctly evaluated and understood.

Sufficient number of competent staff; availability of resources.

- Sufficient staffing for planning or execution of tasks with the right level of expertise/skills should be ensured at any stage of the recovery or after, especially when downsizing the organisation. This also applies to the safety departments.
- Ensure there is extra capacity to deal with increased sickness, increased delays and staff having to quarantine (staff may be required to self-isolate due to contact with an infected person, or from local lockdown restrictions), particularly for safety critical activities.
- Consider that some tasks are more complex than others and may require a minimum, incompressible staffing level. In other words, staffing is not necessarily proportionate to the

volume of the operations, but to the complexity of the activities (e.g. reduced flying activity does not mean that fewer safety staff are needed as the risks in the operations still need to be effectively managed and are probably increased during the pandemic).

- Monitor staff workload and resources to avoid overloaded staff as it may result in delays, omissions of critical risk management tasks, and more stress generated for the staff, with the potential for errors being made.
- Operations should be executed only if sufficient internal resources (qualified staff, documentation, materials, tooling and equipment) and subcontracted services are available.

Training and recency.

- Existing training programmes, initially designed for “normal operations”, have to be re-assessed as they may insufficiently cope with skills and knowledge degradation during this exceptional period, notably where continuous qualification is needed.
- The drastic reduction in air traffic means that many aviation professionals are not performing their normal tasks, sometimes not working at all or at a substantially reduced frequency. This is exacerbated by disruptions to training activities due to a multitude of factors, such as travel restrictions, the closure of training centres, lack of simulators, lack of available instructors and trainers whose instructional knowledge may have also eroded during this period, etc.
- A review of existing and updated procedures is needed to ensure that personnel are trained in the new/updated procedures that may have been introduced as a result of the pandemic. Training needs and qualification status for all staff, internally and externally, should be continuously monitored. Additional training for new tasks or new procedures or training for continuous qualification should be provided and planned in a timely manner.
- A proper induction to the organisation’s procedures needs to be ensured in the case of contracting certified external expertise or recalling former employees.
- Additional training measures may need to be implemented during on-the-job training as there might be not enough activities to fulfil training objectives.
- Periodic safety performance checks should be exercised to verify the competence of personnel: Internal audits shall ensure that the correct procedures have been implemented and adhered to by the staff.
- More information on best practices to address this risk that is, i) applicable to all aviation domains, and ii) domain-specific information can be found in the [EASA Together4Safety Air Ops Community Website](#).

National Competent Authority (NCA) oversight.

- The NCA should monitor the effectiveness of organisation’s management system considering the impact of possible cost cutting measures put in place by the organisation.
- Moreover, the NCA should consider giving priority to oversight activities of the management system, the management of changes, and compliance monitoring.
- With respect to the above, the NCA should scrutinise that the organisation’s risk management tasks are effective and are being safely conducted. Attention should be given to eroded safety signals or trends from safety-occurrence reporting, such as from the FDM programme.
- Refer to the [EASA’s COVID-19 support material](#) for further information.

Further Reading: There are many different sources of further reading on this subject. Please visit the [EASA Together4Safety Air Ops Community Site](#) or the [EASA website](#) on COVID 19 for more information.