Implementig Just Culture principles
-
Need for a robust Policy

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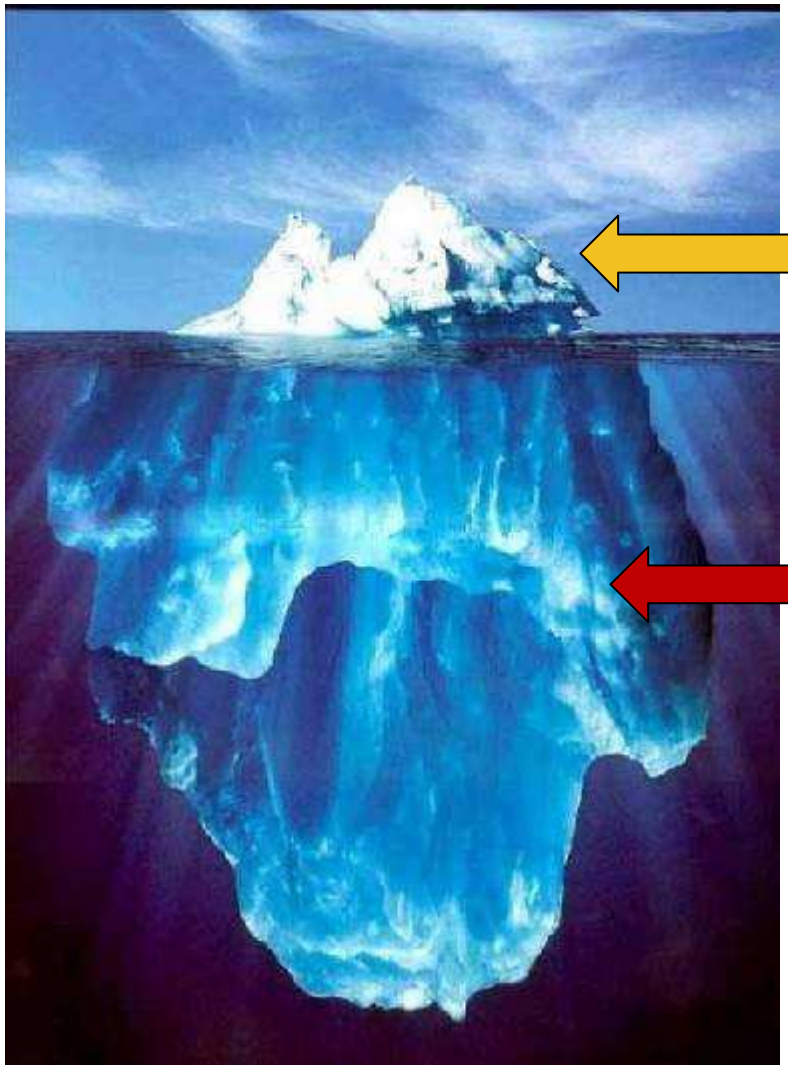
Why do we need Just Culture?

- ATM system is a complex system changing rapidly
- ATM SMS is relying on well trained, skilled and motivated operators but still with human limitations
- New Regulatory and Performance requirements have been defined (e.g. EC Regulation 691/2010)
- Just Culture is seen as fundamental for good safety management system performance in a number of industries and ATM is not an exception
- An effective reporting culture strongly depends on how organisations handle blame and punishment.
- Emerging threats are low frequency and hard to detect (i.e. weak signals)
- Need to move from reactive to more proactive and predictive Safety Management strategies.

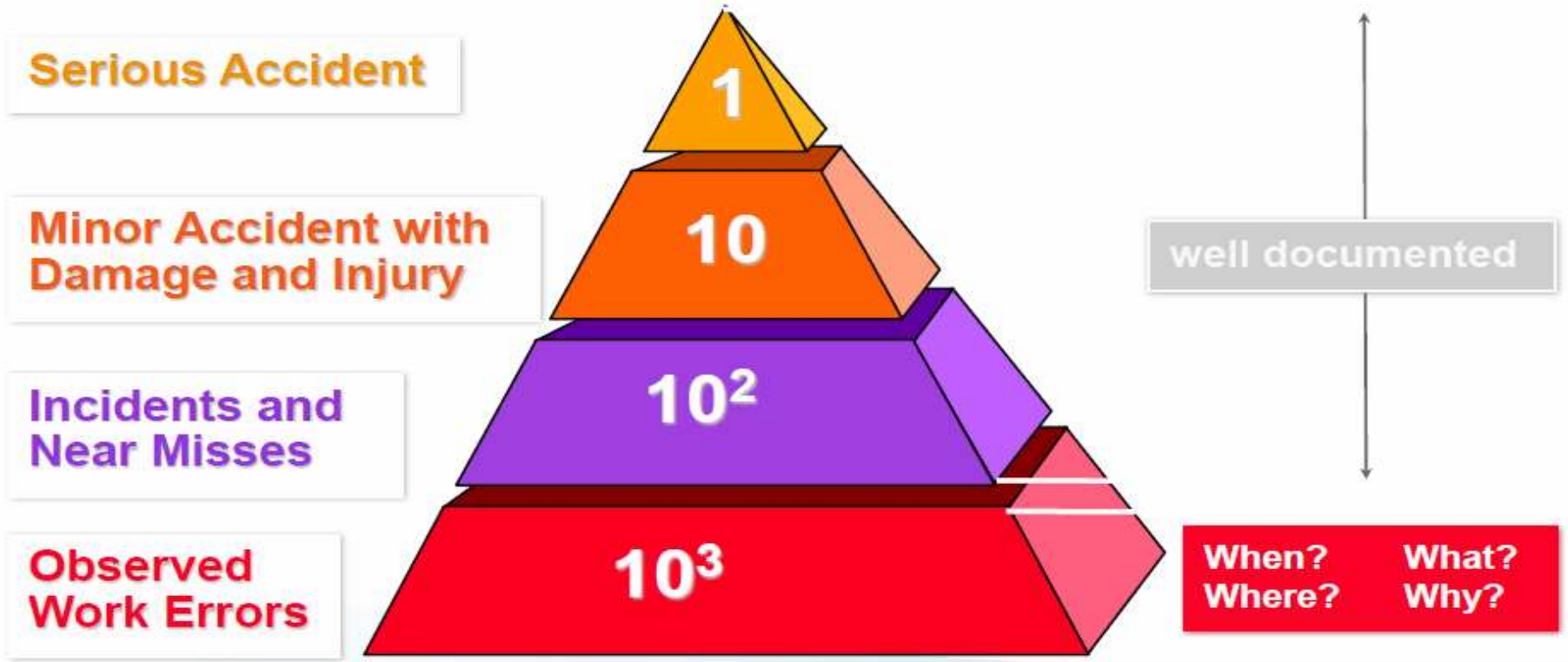
Safety-related Information



What you know

What you don’t know but ….
should keep you awake at night!

Occurrences Pyramid



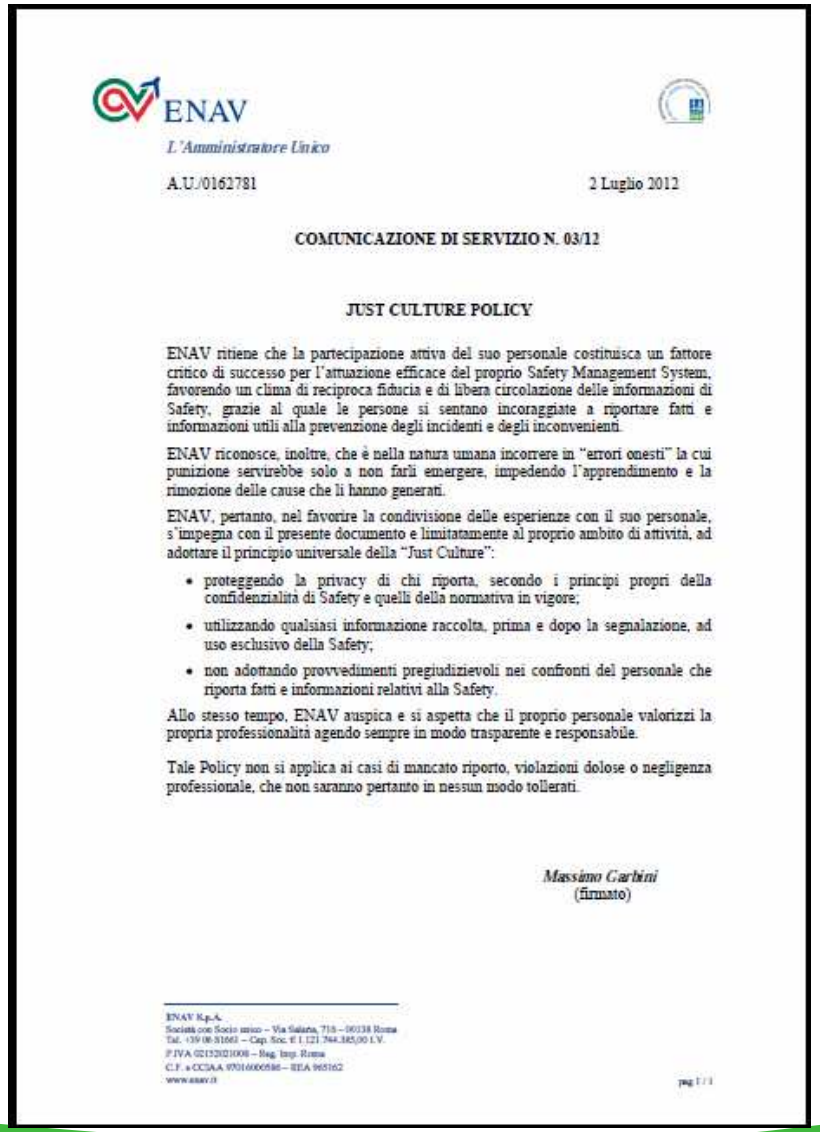
- Mistakes in aviation occur because *"errare humanum est"* and …. we'll not be able to change that!
- To have an effective SMS it is really important that even apparently minor occurrences are investigated to prevent catalysts for major accidents.

The need for a robust JC Policy

- To get all the safety infomation and learn from safety occurrences, it is important to educate our people to acknowledge and be honest about their mistakes
- This is an attitude that could be exploited developing a positive and pro-active Safety Culture across the Organization that encourages the reporting of all safety-related information
- As a first step to create and implement the right working atmosphere it is necessary to define and communicate throughout the organisation an ad-hoc Just Culture Policy that:
  - Clearly draws the line between acceptable and unacceptable behaviors
  - Commits the Organisation on the reference JC principles
- In this framework, it is important to ensure the application at all levels of the defined JC principles are monitored and supported
- An ad-hoc process should be also defined to deal with actions in the “grey area”

ENAV Just Culture Policy

- A Corporate initiative on Just Culture launched at the end of 2011 and sponsored by the Company Accountable Manager
- An ad-hoc Just Culture Policy signed and published at beginning of July 2012
- ENAV's Top Management commitment and reference principles defining the Company approach to Just Culture
- Sets up the overall approach to Just Culture reinforcing the link with mandatory and voluntary reporting system
- An ad-hoc JC Action Plan has been launched too.



ENAV

L'Amministratore Unico

A.U./0162781 — 2 Luglio 2012

COMUNICAZIONE DI SERVIZIO N. 03/12

JUST CULTURE POLICY

ENAV ritiene che la partecipazione attiva del suo personale costituisca un fattore critico di successo per l'attuazione efficace del proprio Safety Management System, favorendo un clima di reciproca fiducia e di libera circolazione delle informazioni di Safety, grazie al quale le persone si sentano incoraggiate a riportare fatti e informazioni utili alla prevenzione degli incidenti e degli inconvenienti.

ENAV riconosce, inoltre, che è nella natura umana incorrere in "errori onesti" la cui punizione servirebbe solo a non farli emergere, impedendo l'apprendimento e la rimozione delle cause che li hanno generati.

ENAV, pertanto, nel favorire la condivisione delle esperienze con il suo personale, s'impegna con il presente documento e limitatamente al proprio ambito di attività, ad adottare il principio universale della "Just Culture":

- proteggendo la privacy di chi riporta, secondo i principi propri della confidenzialità di Safety e quelli della normativa in vigore;
- utilizzando qualsiasi informazione raccolta, prima e dopo la segnalazione, ad uso esclusivo della Safety;
- non adottando provvedimenti pregiudizievoli nei confronti del personale che riporta fatti e informazioni relativi alla Safety.

Allo stesso tempo, ENAV auspica e si aspetta che il proprio personale valorizzi la propria professionalità agendo sempre in modo trasparente e responsabile.

Tale Policy non si applica ai casi di mancato riporto, violazioni dolose o negligenza professionale, che non saranno pertanto in nessun modo tollerati.

Massimo Garbini
(firmato)

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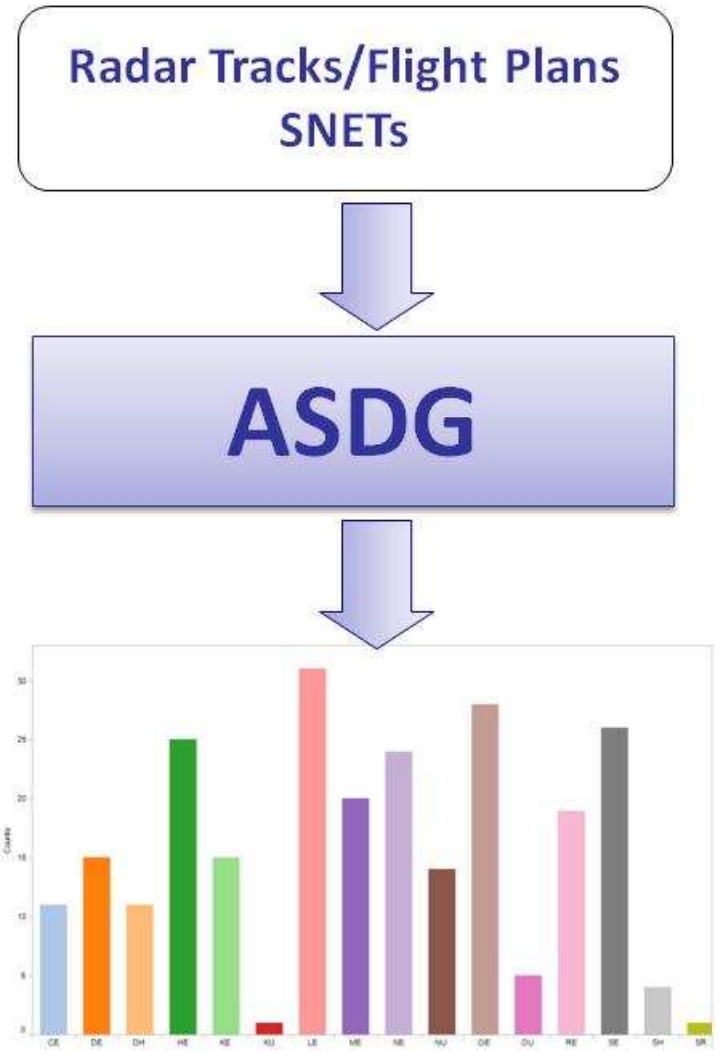
ENAV JC Policy reference principles

- The pro-active participation of workforce considered as key element for having an efficient SMS in place
- Commitment to protect people's honest mistakes
- Protection to the sources of the information
- Non-punitive except in case of gross negligence or willful misconducts
- Safety data used for safety improvement purposes only
- Professionalism, transparency and common trust strongly supported

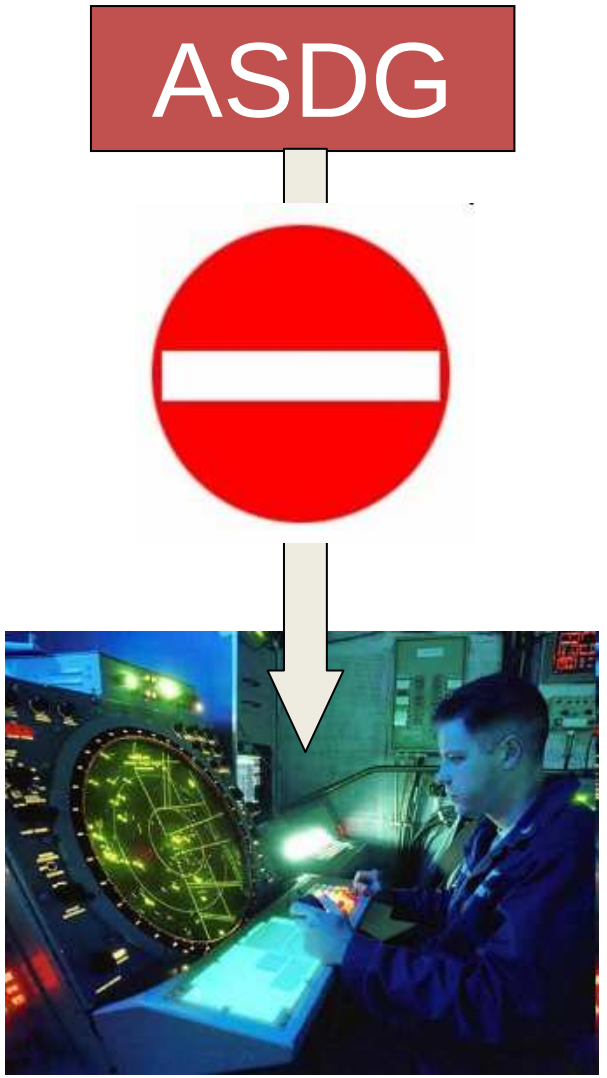
Reporting system and ASDG

- Improvements to the Safety reporting can be further achieved by the use of Automatic Safety Data Gathering (ASDG)
- ASDG should only be used for statistical analysis of de-identified and aggregated safety data making reference to the Company Just Culture/ASMT Policy
- Protection and confidentiality of all the ASDG safety data shall be absolutely guaranteed
- ASDG systems are generally directly connected to SDP/FDP systems
- ASDG could be also used to analyse/monitor some specific latent conditions (such as implementation of new procedures, airspace design etc.)



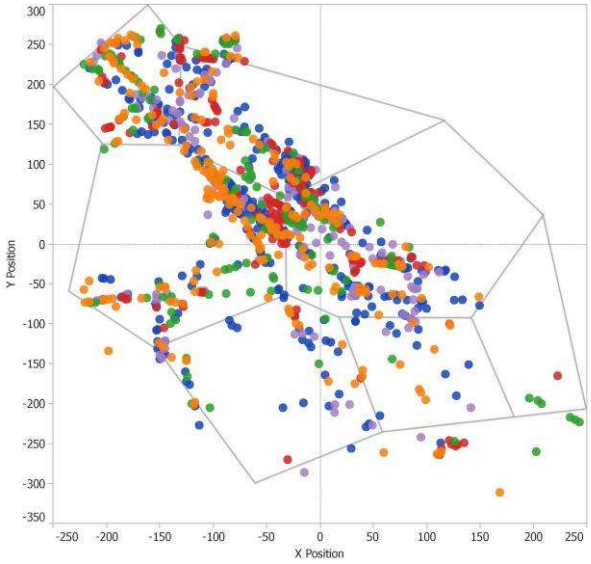
ASDG Policy and Just Culture

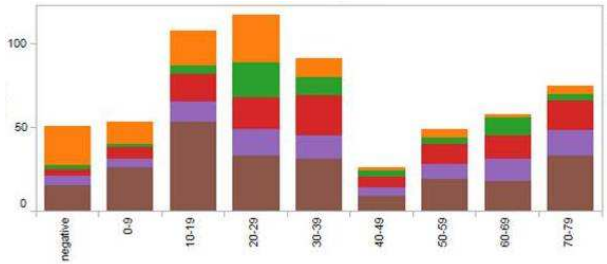
- What cannot be done with ASDG:
  - No real-time analysis of safety events
  - No analysis of ATCOs performance
  - No identification of ATCOs
  - No investigation triggering



ASDG type of analysis

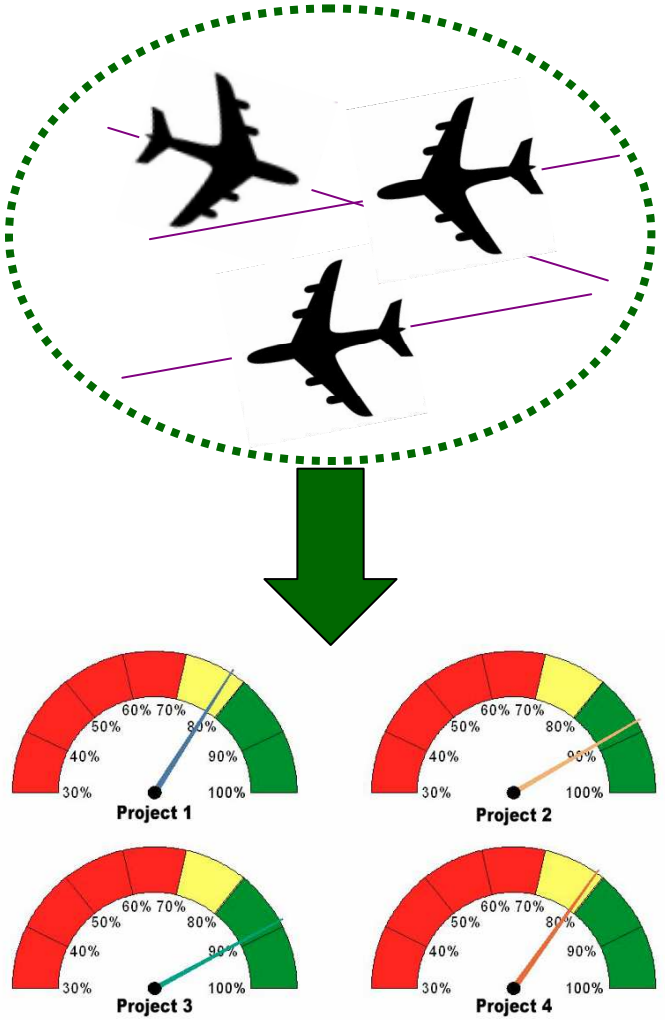
- Define “what” to achieve with ASDG:
  - What type of safety events to be collect?
  - Where? (e.g. PRX/SMI and STCA in airspace managed by Rome ACC)
- What type of safety analyses:
  - Identification of hotspots and resilient areas
  - Distribution of events in the airspace
  - Identification of safety trends
  - Analyses of STCA – PRX correlation





Who should use ASDG

- Define "who" shall use ASDG:
  - Only HQ Safety Division (not local Safety Units!)
  - Data are exclusively managed by HQ Safety Investigators
  - Only HQ Safety Investigators shall decide whether data should be shared with local Safety Units or not.



Key elements for JC implementation

- A clear and robust Just Culture Policy understood by all stakeholders and communicated/promoted throughout the Organisation
- Clear definitions of acceptable and unacceptable behaviour
- Need to protect the source of information, but also….
- Need to ensure the highest operational professionalism and discipline
- Process to deal with actions in the “grey area”
- Reporting system clearly linked to Just Culture and Safety Policy
- Monitoring/supporting the implementation of Just Culture principles at all levels

Conclusions

- Just Culture is mainly based on trust that takes a long time to be built and just few moments or actions to be destroyed!
- States have still different principles/laws which sometime override/challenge protection from blame or repressive action
- In the world there are still some cases of prosecution against individuals/organizations reporting safety-related occurrences
- Just Culture will ultimately work only if:
  - The interaction with the Judiciary system is clear and transparent
  - The Judiciary trusts ATM to do the “right thing”
  - Building that mutual trust is the next big challenge for the aviation community

Thank you for
your attention!
Questions