Just Culture Policy
ENAV approach

ES2 28/10/2020

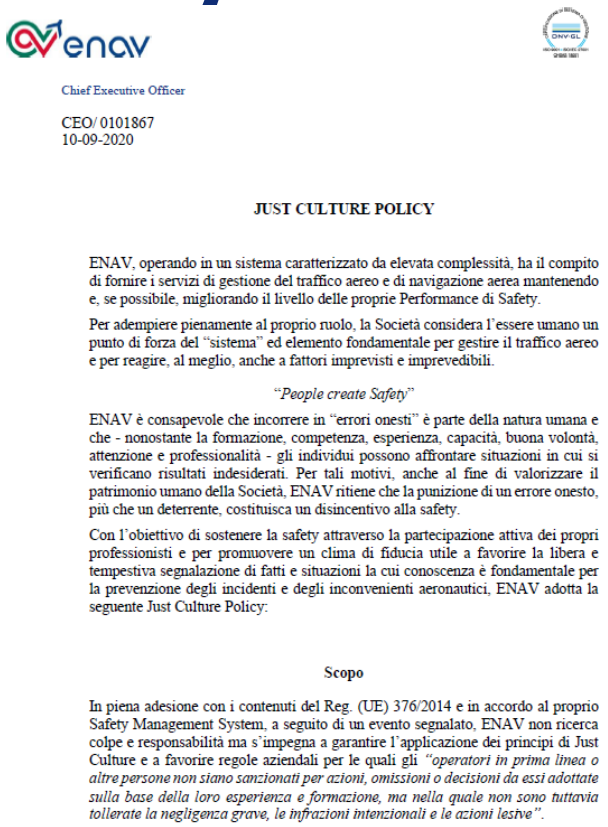
Main points

- ENAv's Just Culture system
- Focus on:

1. Who trigger the process and decide
2. How to distinguish accettable vs unaccettable -
3. External in fluences (other JC policies)?

Just Culture Policy

- Last update 10 september 2020
- 3 pages
- Signed by CEO
- Supplemented by SMS



enav

Chief Executive Officer

CEO/ 0101867
10-09-2020

JUST CULTURE POLICY

ENAV, operando in un sistema caratterizzato da elevata complessità, ha il compito di fornire i servizi di gestione del traffico aereo e di navigazione aerea mantenendo e, se possibile, migliorando il livello delle proprie Performance di Safety.

Per adempiere pienamente al proprio ruolo, la Società considera l'essere umano un punto di forza del "sistema" ed elemento fondamentale per gestire il traffico aereo e per reagire, al meglio, anche a fattori imprevisti e imprevedibili.

"*People create Safety*"

ENAV è consapevole che incorrere in "errori onesti" è parte della natura umana e che - nonostante la formazione, competenza, esperienza, capacità, buona volontà, attenzione e professionalità - gli individui possono affrontare situazioni in cui si verificano risultati indesiderati. Per tali motivi, anche al fine di valorizzare il patrimonio umano della Società, ENAV ritiene che la punizione di un errore onesto, più che un deterrente, costituisca un disincentivo alla safety.

Con l'obiettivo di sostenere la safety attraverso la partecipazione attiva dei propri professionisti e per promuovere un clima di fiducia utile a favorire la libera e tempestiva segnalazione di fatti e situazioni la cui conoscenza è fondamentale per la prevenzione degli incidenti e degli inconvenienti aeronautici, ENAV adotta la seguente Just Culture Policy:

Scopo

In piena adesione con i contenuti del Reg. (UE) 376/2014 e in accordo al proprio Safety Management System, a seguito di un evento segnalato, ENAV non ricerca colpe e responsabilità ma s'impegna a garantire l'applicazione dei principi di Just Culture e a favorire regole aziendali per le quali gli *"operatori in prima linea o altre persone non siano sanzionati per azioni, omissioni o decisioni da essi adottate sulla base della loro esperienza e formazione, ma nella quale non sono tuttavia tollerate la negligenza grave, le infrazioni intenzionali e le azioni lesive"*.

enav group

ENAV JCP

Fundamentals 1

1. Description of why
2. Humans as strength in a trusty envmnt
3. Addressee
   - N° 1- Management for positive and proactive Safety
   - N° 2 Employees (all) for operating responsibly
4. JC Definitions
5. Exclusions
6. Legal support
7. Complemented by SMS

From theorySMS to practiciSMS

JCP-Easy to write difficult to operate JC system.

- More than 10 years experience thought

Typical run aground

1. Who trigger the process and decide if yes or not?
2. How to distinguish accettable vs unaccettable - **interpret human behaviour?**
3. How prevent years of work from being destroyed by external (other JC policies)?

Who trigger and decide?

First question yourself, who is

1. Independent?
2. Impartial?
3. Subject matter expert?
4. Trained to assess human behaviour?
5. With deep knowledge of the event
6. The 1° to lose face if the process fails?

Very often only few reach 3 out of 6

Focus on issue 1

Decide when and what

Who:

1. Trigger the process
2. Assess human behaviours
3. Decide if yes or not?

- Endless discussion on this.
- Past experiences?
  - Istintive line management reaction
  - Possible decisions based on negotiation or on the needs (summer etc.) rather than Just

Who trigger and decide if?

Based on Regulation and Safety culture, ENAV JCP and SMS

- Step 1: Safety Investigator makes the 1° assessment and raises the hand reporting possible presence and elements for why
- Step 2: Responsible for Occurrence Management (along 2 other Investigators) makes a 2° assessment to confirm or deny
- Step 3: Safety Post Holder makes the 3° assessment

If confirmed

- Step 4: is reported to his/her chief for action according to disciplinary code

“Now each man judges well the things he knows, and of these he is a good judge”

Focus on issue 2

What is accettable or unaccettable?

"I don't have my homework, Miss Flynn—my parents forgot to do it."

from The New Yorker

"I lost my homework on the cloud."

How many unaccettable do you expect?

How many fingers did you need in the last 10 years?

I needed one hand

What is accettable or unaccettable?

SMS

Accettable if behaviour was consequence of:

- Set of rules (MOATS, Internal proc.., etc. including their interpretation);
- Training received
- Experience gained
- Operational practices adopted and recognized by the majority of professionals
- Working environment and tools available
- Organizational/local culture
- Human performance limits
- System induced or routine violation

Focus on issue 3

External influences

How to prevent, even if small, influences and differences of other policies?

Years to build trust, 1 case or few to destroy

In the SSP and national (State) Just Culture Policy we agreed to halt any external assessment in case a certified Organizzation has and operate its own