



Leonardo Helicopters

Safety & Just Culture Principles

(SRS-101&102 supporting documentation)

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SAFETY & JUST CULTURE

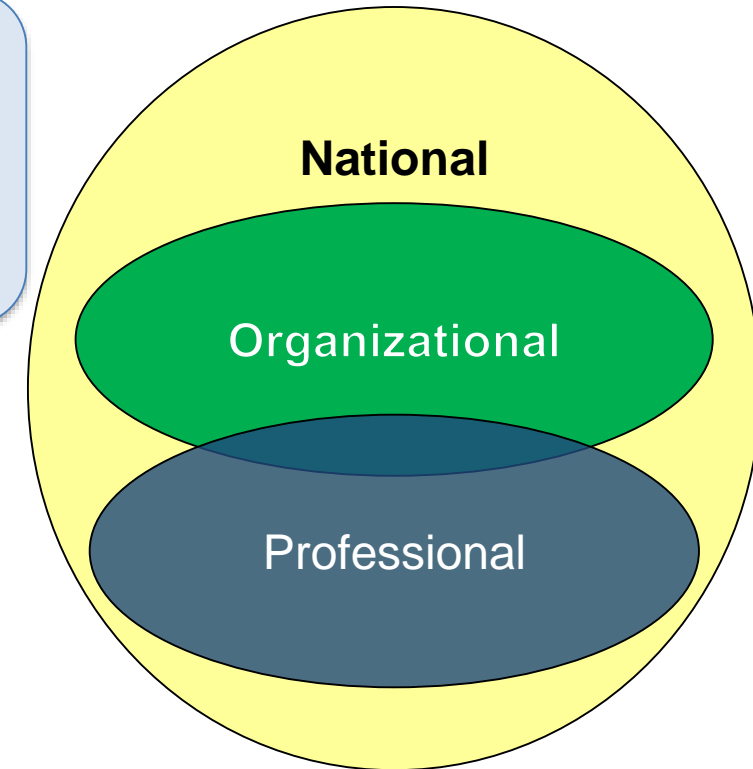
Safety Culture Definition

Safety Culture is the way safety is perceived, valued and prioritized in an organization. It reflects the real commitment to safety at all levels in the organization.

It has also been described as "how an organization behaves when no one is watching".

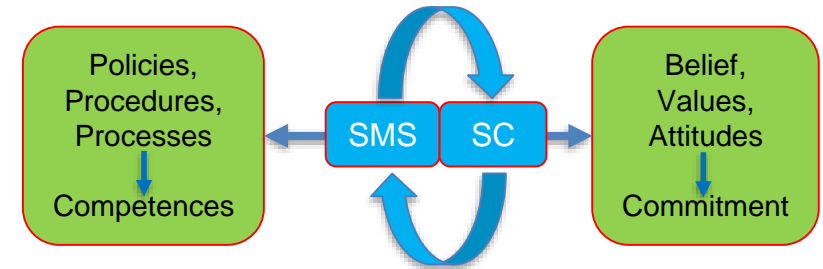
Safety Culture is not something you get or buy; it is something an organization acquires as a product of the **combined effects of Organizational Culture, Professional Culture and, often, National Culture.**

Safety Culture can therefore be positive, negative or neutral. Its essence is in what people believe about the importance of safety, including what they think that their peers, superiors and leaders really believe about safety as a priority.



SAFETY & JUST CULTURE

Safety Culture Definition



- **We already have an SMS, why do we need Safety Culture too?**

A Safety Management System (SMS) represents an organization's competence in the area of safety, and it is important to have an SMS and competent safety staff to execute it. But such rules and processes may not always be followed, particularly if people in the organization believe that, for example, 'moving traffic' is the real over-riding priority, even if risks are occasionally taken.

So, organizations need both a SMS and a healthy Safety Culture in order to achieve acceptable safety performance.

- **If you want to remain safe, you have to know the realities of safety in your organization**

The more robust approach is to carry out a Safety Culture survey which attempts to 'measure' Safety Culture in a way which can be repeated subsequently for comparative purposes.



SAFETY & JUST CULTURE

Just Culture Definition



One key to the successful implementation of safety regulation is to attain a **“just culture” reporting environment** within aviation organizations, regulators and investigation authorities. This effective reporting culture depends on how those organizations handle blame and punishment.

“Just culture” is an atmosphere of trust in which people are encouraged, even rewarded, for providing essential safety-related information - but in which they are also clear about where the line must be drawn between acceptable and unacceptable behavior.

- There is a need to learn from accidents and incidents through safety investigation so as to take appropriate action to prevent the repetition of such events. In addition, **it is important that even apparently minor occurrences are investigated**, in order to prevent catalysts for major accidents.



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Just Culture Definition

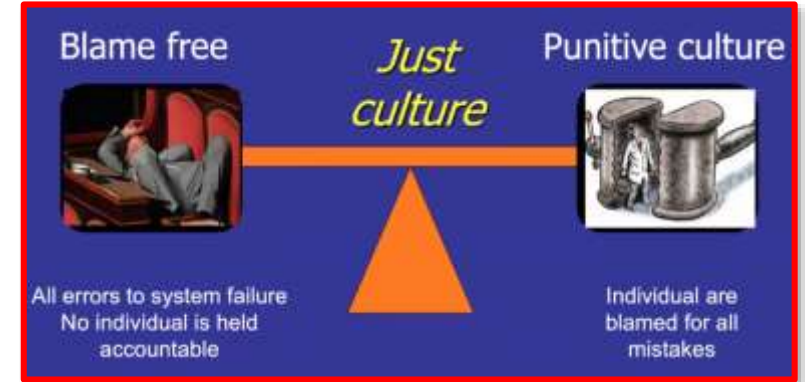
Conditions for Just Culture

Under “Just Culture” conditions, **individuals are not blamed for ‘honest errors’, but are held accountable for willful violations and gross negligence.**

- People are less willing to inform the organization about their own errors and other safety problems or hazards if they are afraid of being punished or prosecuted. Such lack of trust of employees prevents the management from being properly informed of the actual risks. Managers are then unable to make the right decisions in order to improve safety. However, a totally “no-blame” culture is neither feasible nor desirable. Most people desire some level of accountability when a mishap occurs.



“Just Culture” is a culture in which front-line operators and others are not punished for actions, omissions or decisions taken by them which are commensurate with their experience and training, but where gross negligence, willful violations and destructive acts are not tolerated.



SAFETY & JUST CULTURE

Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014

Excerpt 1

(1) A high general level of safety should be ensured in civil aviation in the Union and every effort should be made to **reduce the number of accidents and incidents with a view to ensuring public confidence in aviation transport.**

(6) In order to improve aviation safety, relevant **civil aviation safety information should be reported, collected, stored, protected, exchanged, disseminated and analyzed**, and appropriate safety action should be taken on the basis of the information collected. This proactive and evidence-based approach should be implemented by the relevant aviation safety authorities of Member States, by organizations as part of their safety management system and by the Agency.



SAFETY & JUST CULTURE

Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014

Excerpt 2

(8) It is necessary to ensure that front-line aviation professionals report occurrences that pose a significant risk to aviation safety. **Voluntary reporting systems should complement the mandatory reporting systems, and both should allow individuals to report details of aviation safety-related occurrences.** Mandatory and voluntary reporting systems should be set up within organizations, the Agency and competent authorities of the Member States.

(34) In order to ensure the confidence of employees or contracted personnel in the occurrence reporting system of the organization, **the information contained in occurrence reports should be protected appropriately and should not be used for purposes other than maintaining or improving aviation safety.** The internal 'just culture' rules adopted by organizations pursuant to this Regulation should contribute in particular to the achievement of this objective.



SAFETY & JUST CULTURE

Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014

Excerpt 3

(36) In addition, the civil aviation system should promote a **‘safety culture’ facilitating the spontaneous reporting of occurrences and thereby advancing the principle of a ‘just culture’**. **‘Just culture’ is an essential element of a broader ‘safety culture’, which forms the basis of a robust safety management system**. An environment embracing ‘safety culture’ principles should not prevent action being taken where necessary to maintain or improve the level of aviation safety.

(37) **A ‘just culture’ should encourage individuals to report safety-related information. It should not, however, absolve individuals of their normal responsibilities**. In this context, employees and contracted personnel should not be subject to any prejudice on the basis of information provided pursuant to this Regulation, except in cases of willful misconduct or where there has been manifest, severe and serious disregard with respect to an obvious risk and profound failure of professional responsibility to take such care as is evidently required in the circumstances, causing foreseeable damage to a person or to property, or seriously compromising the level of aviation safety.



SAFETY & JUST CULTURE

The Company Safety Policy

The Company undertakes:

- to **build the Leadership at all levels, to inspire, promote and communicate safe behaviors and examples across the business.** This will be achieved by enforcing highest existing "safety" standards, developing, implementing and maintaining strategies and processes suitable to ensure, in normal and potential emergency situations, that **all activities are carried out in the safest environment** possible and to, constantly, improve them. (Active Leadership)
- to **practice a Just Learning and Reporting Culture** in which **everyone is trusted and treated fairly, but willful violations are not tolerated.** Mutual trust, respect and openness of communication between all employees and hierarchical levels to be supported and widespread within the Company. Thus fostering an environment where "Safety", in the wider sense of the Word, becomes an integral part of the Company's common culture and behavior, imprinting Management and Employees at all levels, so that the **Safety of our Products, the People working on and with them and the Company Personnel will be the highest priority on all occasions.** (Culture)

Vision

The Company is strongly committed to being **"the safest manufacturer and service provider in the world"**.

The **protection of human life and Company assets including Customers' trust shall be our first priority.** This Policy is being published to enforce our values across the whole organization as a required and distinguishing **characteristic of all personnel, originating from Top Management commitment.**

Mission

To achieve this essential goal the Company will focus efforts on improvements in the following five areas: **Leadership, Culture, Competence, Capability and Assurance.**



SAFETY & JUST CULTURE

The Company SMS Manual

The Company has implemented internal rules, documented processes and applied them consistently throughout the Organization.

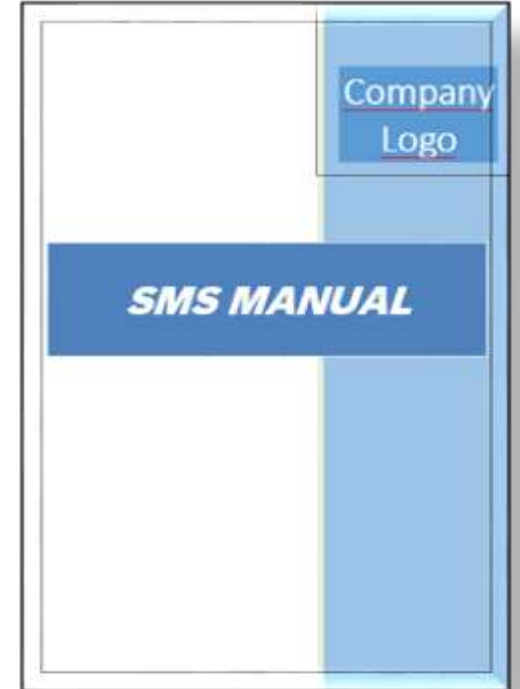
- Safety is not only a legal requirement but also a key contributor to sustainable business.
- Staff working in the Company, at all levels, have a safety responsibility and are key to maintaining and improving the implemented Safety Systems.

A safe Aviation System requires that events that affect or could affect aviation safety are reported fully, freely and in a timely manner. This is necessary to facilitate investigation and implementation of lessons learnt.

“Just Culture lies at the heart of an effective reporting system and such a system is needed to maintain and improve Aviation Safety.”

The above Just Culture Declaration:

- **supports existing legislation, in particular Regulation (EU) No 376/2014, on the reporting, analysis and follow-up of occurrences, and;**
- **constitutes a set of key principles implemented in the Company Just Culture internal rules.**



SAFETY & JUST CULTURE

The Company SMS Manual

- Adoption of the Just Culture Declaration, will ensure that **no action is taken against any employee who discloses a safety concern** through the hazard reporting system. Exceptions would be if such a disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, a deliberate or willful disregard of regulations or procedures, a violation or destructive act.
- In order to enhance the confidence of individuals in the system and to prevent the use of information for purposes other than Safety, **the handling of occurrence reports shall be organized in such a way as to appropriately safeguard the confidentiality of the identity of the reporter** and other persons mentioned in occurrence reports, thus fostering a “Just Culture”.
- In order to ensure the confidence of employees or contracted personnel in the Occurrence Reporting System (ORS) of the Organization, **the information contained in occurrence reports is protected appropriately** and not used for purposes other than maintaining or improving aviation Safety.
- A clear separation between the office handling occurrence reports and the rest of the Organization, is an efficient way to limit the transmission of personal details or of information allowing the identification of the reporter or of the other persons mentioned in occurrence reports.



SAFETY & JUST CULTURE

The Company SMS Manual

How to create a Safety Culture

1) Organization-wide Buy-In:

- **Top-level commitment.** The active involvement of senior management in the safety system is very important:
 - Managers, on the 'shop floor', should talk about safety and visibly demonstrate their commitment by their actions;
 - Workers need to know that safety never competes with other priorities - safety always comes first.

- **Employee participation.** Encourage teams to proactively to the company's safety vision;
- **Meaningful investments.** Evidenced by signage, the way employees do their jobs, safety evolution in the company;

2) **Comprehensive Training.** Perform follow-up testing and periodic Refreshment Training;

3) **Full Communication.** Timely, specific and fair feedback. Sharing lessons and best practices so everyone can improve;

4) **Safety Action/Working Group activity.** Drill down into departments, processes and events, Identifying the hazards, etc.;

5) **Review.** Interview, in a non-threatening manner, a suitable cross-section of the company, to provide a helpful picture of the overall company culture;

6) **Safety Manager(s).** Responsible for understanding what it will take to build a safety culture in their area;

7) **Maintaining a Safety Culture.** Avoid complacency, keep things safe as a target in its own right, keep close to the hazards.

Safety is **PROMOTED** at the top level
(policies, rules, system, processes, procedures)



Safety is **MEASURED** at bottom level
(behaviours, practices, attitudes, errors, rules, respect)





THANK YOU
FOR YOUR ATTENTION

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