

Safety Policy & Safety culture in the EASA Management System framework

Project EuroMed Transport Aviation Project (ETAP)

MENA ARCM/4 Meeting – The Prevention of Aircraft accidents and incidents
through the collection & Analysis of safety data & information

10-12 July 2023 , Rabat, Morocco

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EASA

Your safety is our mission.

The EU Aviation System



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Drafts/ proposes rules issues AMC, CSs & GM

Issues some certificates/approvals

Performs inspections

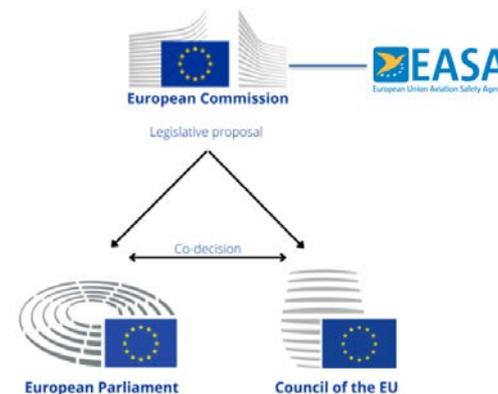
Manages the European Plan for Aviation Safety



Adopts rules

Manages Air Safety List

Launches infringement procedure



The legal framework – ICAO level



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In 2007, ICAO harmonized its approach to SMS in all annexes broken into the following distinct areas :

- State Safety Program (State level)
- State Safety Oversight (State level)
- Safety Management System (Operator level)
- Safety Data collection, analysis and exchange (State level)



Component of an SSP:

- State Safety policy and objectives
- State Safety Risk Management
- State Safety Assurance
- State Safety Promotion



The legal framework – EASA level



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- EASA Basic Regulation (Reg. 1139/2018, Chapter 3 – Aviation Safety Management:

- Article 6 – European Plan for Aviation Safety
- Article 7 – State Safety Programme
- Article 8 – State Plan for Aviation Safety



- Implementing Rules for Air Operations (Reg. 965/2012), Section II Management:

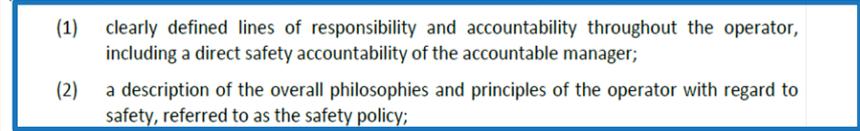
- Part-ARO, ORO.GEN.200 Management system for Authorities
- Part-ORO, ORO.GEN.200 Management system for Operators



ORO.GEN.200 Management system

Regulation (EU) No 965/2012

- (a) The operator shall establish, implement and maintain a management system that includes:
 - (1) clearly defined lines of responsibility and accountability throughout the operator, including a direct safety accountability of the accountable manager;
 - (2) a description of the overall philosophies and principles of the operator with regard to safety, referred to as the safety policy;
 - (3) the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
 - (4) maintaining personnel trained and competent to perform their tasks;
 - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
 - (6) a function to monitor compliance of the operator with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
 - (7) any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes.
- (b) The management system shall correspond to the size of the operator and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.



GM and AMC to ORO.GEN.200

Safety Policy – What does the rule say?



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AMC1 ORO.GEN.200(a)(2) Management system COMPLEX OPERATORS — SAFETY POLICY

- (a) The safety policy should:
 - (1) be endorsed by the **accountable manager**;
 - (2) reflect organisational commitments regarding safety and its proactive and systematic management;
 - (3) be communicated, with visible endorsement, throughout the operator; and
 - (4) include safety reporting principles.
- (b) The safety policy should include a commitment:
 - (1) to improve towards the highest safety standards;
 - (2) to comply with all applicable legislation, meet all applicable standards and consider best practices;
 - (3) to provide appropriate resources;
 - (4) to enforce safety as one primary responsibility of all managers; and
 - (5) **not to blame someone for reporting something which would not have been otherwise detected.**

- (c) Senior management should:
 - (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
 - (2) provide necessary human and financial resources for its implementation; and
 - (3) establish safety objectives and performance standards.

GM1 ORO.GEN.200(a)(2) Management system SAFETY POLICY

- The safety policy is the means whereby the operator states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.
- The safety policy should state that the purpose of safety reporting and internal investigations **is to improve safety, not to apportion blame to individuals.**



Safety Policy – In short



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- The safety policy is the basis of the safety management system
- It provides the overall guidance, direction and commitment by the operator management for the safety of operations.
- A strong safety policy that is well communicated will allow the SMS to grow and ensure the development of a safety culture
- A safety policy is supported by safety objectives



Safety Accountability and Responsibilities



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ORO.GEN.200(a)(1) Managementsystem

→ MEANING OF THE TERMS 'ACCOUNTABILITY' AND 'RESPONSIBILITY'

In the English language, the notion of accountability is different from the notion of responsibility. Whereas 'accountability' refers to an obligation which cannot be delegated, 'responsibility' refers to an obligation that can be delegated



Responsibilities for safety relevant activities have to be clearly defined throughout the organization to ensure adequate management of safety issues and to avoid the "passing the buck" phenomenon

Not two functions shall have the same responsibility. If so, it is always "the other one" who is responsible.

Various Safety Roles and responsibilities are covered into the GM and AMC to ORO.GEN.200

Safety culture/just culture, pillars of the SMS



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- Safety culture is arguably the single most important influence on the management of safety.
- Safety Culture: It is hard to quantify and difficult to describe exactly, but the general principle is that safety culture is:

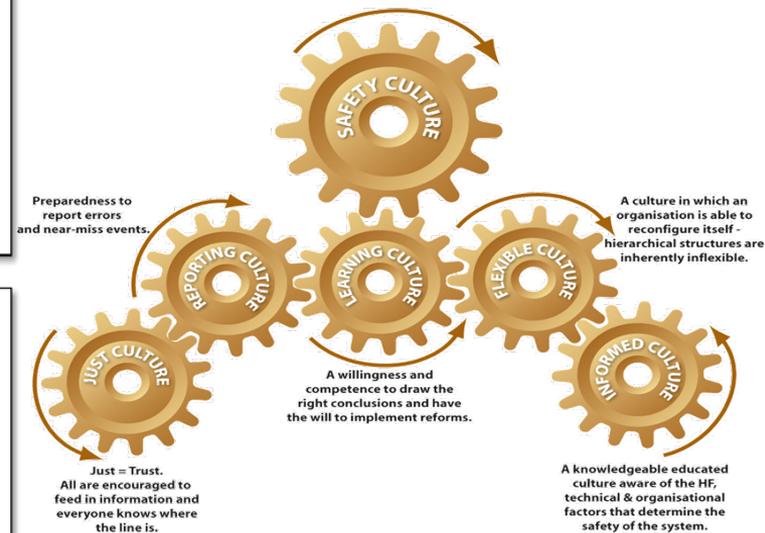
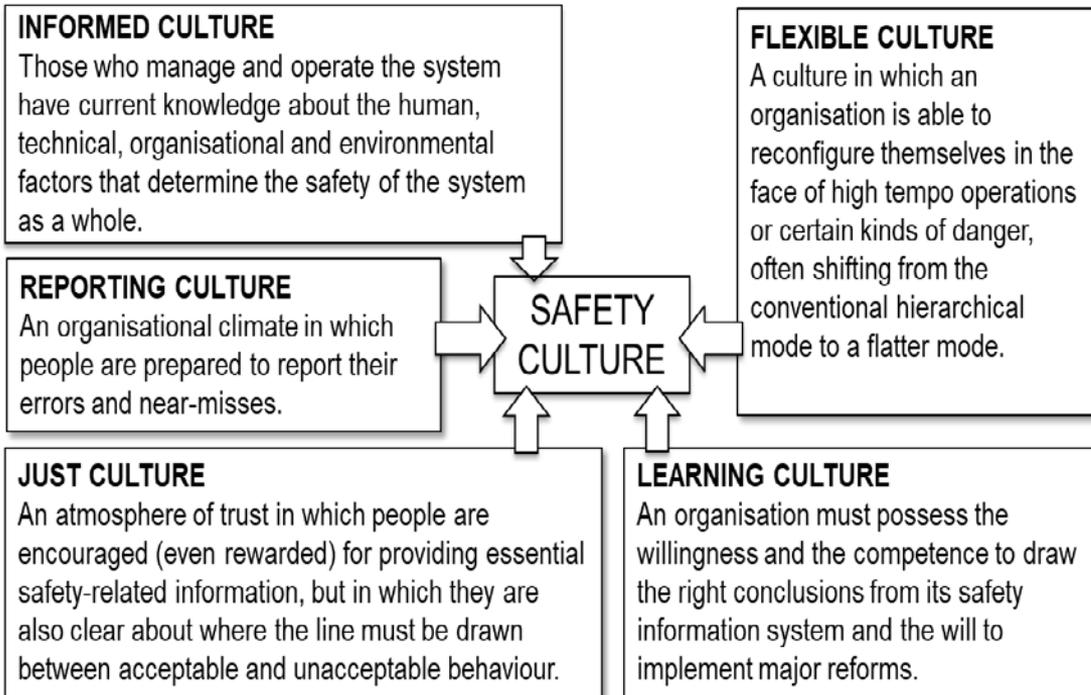
"the way safety is perceived, valued and prioritized in an organization. It reflects the real commitment to safety at all levels within the organization."

→ The safety culture of an organization significantly influences how the Aerodrome's Safety Management System develops, and how effective it becomes.
- **Safety culture has a direct impact on safety performance !**

Safety Culture is how you will do “safety” as an organisation



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Zoom on reporting culture



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- The organization fosters an atmosphere where the employees have trust in reporting safety concerns without fear of blame.
- Employees must know that confidentiality will be maintained and information submitted will be acted upon (otherwise - what is the benefit in their reporting)
- Everyone is encouraged to report safety concerns
- Safety concerns are analyzed and follow-up actions is taken including feedback to the originator.





Zoom on Just culture



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Just Culture is defined as “A culture in which operational staff or others are not held accountable for actions, acts, omissions or decisions commensurate with their experience and training, but gross negligence, intentional violations and destructive actions are not tolerated” EC 376/2014 Art. 2 Para. 12.

- **Concretely:**

- Management recognises that most errors are unintentional
- Efforts are made to correct unsafe conditions
- When gross negligence or malicious intent is proven, action is taken by management
- Individuals are not blamed for "honest errors" but are held accountable for not following procedures, willful violations, and gross negligence
- Individuals are clear about where the line must be drawn between acceptable and unacceptable behavior
- Sanctions have been agreed for unacceptable behavior
- Individuals as well as the organization learn from unsafe acts in order to improve the level of safety awareness

Good practice on Safety Culture



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Since Safety Policies states that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals, a good practice is to append to the Safety Policy a “Protection of the Reporters – Just culture ” sub-policy. An example is provided below:

Protection of the Reporters – Just culture

The Company is committed to operate according to the highest safety standards.

To achieve this goal, it is imperative to have uninhibited reporting of all accidents, incidents, events, hazards, risks and other information that may compromise the safe conduct of our operations. To this end, every staff member is warmly encouraged to, and responsible for, reporting any safety-related information.

Reporting is free of any form of reprisal. The main purpose of reporting is risk control and accident and incident prevention, not the attribution of blame. No action will be taken against any staff member who discloses a safety concern through the reporting system, unless such disclosure reveals, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

Our method for collecting, recording and disseminating safety information guarantees the protection to the extent permissible by law, of the identity of those who report safety information.

(Signed and dated) / Accountable Manager

Reality/ Culture - Would you enjoy these holiday photos?



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Without the right culture

- No one will tell you anything so you will be working blind
- Your investigation will blame a person but never identify the root cause of a risk or hazard
- Your organisation will never be interested in learning
- Staff will just do what they are told until something unusual happens



Summary - policy, culture and accountabilities



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Policy



What you will do?

Your commitment to improving safety and managing the risks in your operation

Culture



How you will do it?

What you will do to create the conditions so that people can talk openly about safety

Accountabilities



Who will do it?

Clearly defines the people in your organisation who are responsible for managing safety



Thank you

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