



*International Civil Aviation Organization*

**TWELFTH MEETING OF THE ASIA PACIFIC REGIONAL AVIATION SAFETY TEAM  
(APRAST/12)**

*Bangkok, Thailand, 28 May to 1 June 2018*

**Agenda Item 5: Presentations – State / Industry / ICAO**

**FOSTERING JUST CULTURE IN OPERATORS AND SERVICE PROVIDERS**

*(Presented by NokScoot Airlines, AEROTHAI and CANSO)*

**SUMMARY**

Just culture is a fundamental component in Safety Culture which promotes effective Safety Management System. This paper aims to:

1. Start a conversation on Just Culture in APAC region
2. Provide tools and implementation guideline to improve Just Culture
3. Share experience and lessons' learned from NokScoot and AEROTHAI

**1. INTRODUCTION**

1.1 During APRAST/11 Meeting held in November 2017, a paper on airspace safety reporting was presented. The paper highlighted outcomes of RASMAG/22's airspace safety analysis and results of an Airspace Safety Reporting Policy Survey conducted by ICAO Regional Office. The safety analysis indicated overall low reporting rates, whilst the survey results showed many States or administrations did not have written policies and rules in place to support open and effective safety reporting. Safety culture and policy regarding safety reporting are essential in creating an environment where people are encouraged to report hazards and incidents. Recognizing that Just Culture is a key component to achieving a positive safety culture, this paper aims to support APRAST participants by providing tools and implementation guideline to improve Just Culture as well as sharing experience from NokScoot and AEROTHAI.

1.2 Why Just Culture?

Positive safety culture is an overarching element of safety management system. Just Culture is a critical component of a positive Safety Culture. The five general elements of safety culture are illustrated below.



**Elements of Safety Culture**

- Just Culture: An atmosphere of trust in which people are encouraged to provide essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behaviour.
- Reporting Culture: An environment that facilitates the sharing of safety information.
- Informed Culture: Those who manage and operate the system have current knowledge about the human, technical, organizational and environmental factors that determine the safety of the system as a whole.
- Learning Culture: People possess the willingness and the competence to draw the right conclusions from its safety information system and the will to implement major reforms.
- Flexible Culture: The ability to adapt organizational process when faced with temporarily high demand, danger or emergency situation.

A strong Just Culture in an organization is foundational for a positive safety culture. Having Just Culture enables operators and service providers to create a positive environment where the employees feel comfortable to report incidents and share safety information without subjecting to any punitive actions. Therefore, a strong Just Culture is a key enabler to foster and support the other components of safety culture.

**2. REFERENCES**

- Annex 19 – Safety Management
- Doc 9859 – Safety Management Manual (SMM)
- GASP – Global Aviation Safety Plan
- CANSO Guidelines on Just Culture Version 1.0
- CANSO CANSO Standard of Excellence in Safety Management Systems, Second Edition (2015)
- Sidney W. A. Dekker (2009) Just culture: who gets to draw the line? Cognition, Technology and Work , Volume 11 Issue 3, September 2009
- EUROCONTROL’s video on Just Culture - Because we are all humans
- ESARR’s Advisory Guidance Document - Establishment of Just Culture’ Principles in ATM Safety Data Reporting and Assessment

### 3. DISCUSSION

#### 3.1 Just Culture principle

Sometimes referred to as a ‘trust culture’ or an ‘open reporting environment’, Just Culture may be defined as “an atmosphere of trust in which people are encouraged to provide essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behaviour, CANSO.”

Here are the well-recognized characteristics of Just Culture:

- Just Culture fosters an environment of trust where employees and operational personnel are not punished for actions, omissions, or decision taken by them that are commensurate with their training and experience.
- Employees feel secure to report and discuss safety issues and mistakes while accepting that they must be individually held to account for their own actions.
- Employees are recognised for the role they play in delivering a safe service. Therefore, the organization is committed to provide the appropriate environment, tools, training and procedures required to perform the job.
- Organization understands that employee may occasionally make mistakes or errors of judgment which could lead to unsafe outcomes.
- When an employee make an error, the organization does not assume or seek to find personal fault or guilt. An employee will not be punished simply for making an honest mistake.
- Just Culture does not mean impunity or blame-free environment. In fact, an organization must learn to differentiate between acceptable and unacceptable behaviour. Risking behavior, gross negligence, deliberately unsafe acts or recklessness will not be tolerated.
- Just culture is about taking the responsibility forward. While the traditional ‘backward-looking accountability’ is when someone takes the blame after an events, Just Culture is about ‘forward-looking accountability’ where employees are empowered to identify hazards and learn what they can do differently to prevent accidents or incidents.
- Employees are expected to be treated fairly after reporting errors. Openness and fair treatment of all staff member are essential.
- Just Culture recognizes that systemic factors must be considered when evaluating human errors.
- Safety information is respected and used only for the safety benefit. The organization will protect and support those who provided the information.

#### 3.2 Key milestones to improve Just Culture for operators and service providers

The meeting is invited to consider the following activities in promoting Just Culture:

- a) Define a Just Culture policy. Executive / Senior Management buy-in and commitment is essential. Just Culture policy should be supported by the highest organizational levels.
- b) Differentiate between acceptable and unacceptable behavior (normal / honest error versus risk-taking behavior, gross negligence, and wilful misconduct).
- c) Set guidelines to protect or de-identify the reporter’s personal information.

- d) Define procedures to address human performance variability. These procedures may include :
  - Tools / methodology to be used to interpret acceptable and unacceptable behavior (normal / honest error versus gross negligence / wilful misconduct)
  - Form a group or a committee to determine or advise on human performance
  - Flow charts or steps to ensure consistent practice across organization.
- e) Educate staff and management. Just Culture principle, policy, and relating procedures should be well understood at all levels in the organization.
- f) Protect and support employee from negative consequences resulting from normal / honest error.
- g) Protect safety data from external interference (within legal limits).
- h) Address the consequences for unacceptable behavior.
- i) Apply reporting and investigation processes systematically within the organization and provide feedback on a timely basis. This will earn the employee's trust.
- j) Establish processes to dialogue with judicial authorities and media to ensure that employees involved in an accident or incident are treated fairly and safety related information is protected.
- k) Make sure that the employees know their rights and responsibilities after an accidents.
- l) Share and learn among different industry sectors to improve the organization's approach to Just Culture.

### 3.3 Experience and lessons learned

#### 3.3.1 AEROTHAI

##### **Experience in Just Culture**

In 2008, AEROTHAI established a Just Culture policy. The policy allowed the company to integrate Just Culture concept into AEROTHAI's 'Employee Rules of Conduct'. Honest / genuine errors made within air traffic services are exempted from Disciplinary action from the company. Managers are also advised to restrain from reprimanding employees associated with incidents / accidents.

AEROTHAI uses the 'Culpability Decision Tree' / 'Substitution Test' developed by Dr. James Reason and Neil Johnston and 'Error Classification and Remedial Action Guideline' from ESARR's Advisory Guidance Document<sup>1</sup> to help determine acceptable and unacceptable behavior and relevant remedial action. The excerpt flow chart of these guidelines are provided in the attachment of this paper.

##### **Lesson Learned**

*Safety work never ends* - The current procedure does not specify who is responsible to classify errors in order to differentiate between acceptable and unacceptable behavior. Occasionally, staff or management who was put in this position feel that they are not equipped to make the decision. This issue contributes to inconsistent remedial actions being addressed which negatively impact the trust environment in the company. Therefore, a procedure improvement to establish a group or a committee with relevant expertise is being considered to move the Just Culture forward.

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<sup>1</sup> Establishment of Just Culture' Principles in ATM Safety Data Reporting and Assessment

*Everyone means well but sometimes safety is sensitive* - Recently, there was a proposal to allocate the safety performance indicator into the performance evaluation of each operational unit to help the company achieve its safety target. This proposal does not directly affect the evaluation of any individual employee or manager but it would mean that operational units are solely responsible for meeting the target rate of occurrences within their sectors. Upon learning of this proposal, the safety department believed that this could result in employees' reluctance to report occurrences and could create a false perception that each operational unit is accountable for all contributing factors of an occurrence. Finally, the proposal was not implemented but the communication is complicated and lengthy.

### **Obstacles**

Protection of safety information from judicial proceedings against employees or operational personnel is essential to Just Culture improvement. Like in many parts of the world, such legislation remains a challenge to public understandings.

### **Sharing of promotional materials**

AEROTHAI has produced a set of video for Safety Culture promotion. The meeting is invited to utilize the material to improve safety culture. The link is provided here: <https://www.youtube.com/playlist?list=PLMQFG1tbD9M1iAqvLBOeY7gdg-sbzkNmB>

## 3.3.2 NokScoot

### **Experience in Just Culture**

NokScoot establish its Just Culture Policy with an aim to develop an environment of trust and open communication in which people are encouraged to openly report safety and security issues. NokScoot recognizes:

(a) Every employee has a duty to report all real or potential accidents, incidents, near-miss, risks and hazards that impact the safety and security of our operation and work environment;

(b) The reporting of safety concerns, errors and mistakes should not result in discipline or punitive action. Managers must recognize that errors and mistakes will occur and must be managed. Blame and discipline for errors and mistakes is ineffective and counterproductive;

(c) Reckless behavior will not be tolerated. Employees who engage in reckless behavior, intentional violations or persistent breaches of company standards, policies or procedures, or a deliberate failure to report may be subject to disciplinary action;

(d) The purpose of a safety investigation is to establish the facts and contributory factors for the prevention of accidents and incidents, not to apportion blame or liability;

(e) Effective safety investigation seeks to identify the cause of human errors and risky behaviors, and take appropriate action to prevent them from recurring;

(f) The Organization is able to learn from errors and mistakes and share this learning in a positive manner that enhances system design and safe behaviors;

(g) The organization has an objective standard for the fair and consistent treatment of all employees, through the application of a decision making process based on Just Culture principles.

### **Lesson Learned**

*Reward system* - NokScoot revamped its safety reporting award program to encourage voluntary and proactive reporting. The program is based on a weighted scoring system. Award winners are selected based on both the quantity and quality of reports over a quarterly period. Reports of hazards or preventative actions (Proactive) taken carry a higher value than reports of incidents or mandatory reportable events (Reactive).

### **Sharing of promotional materials**

During the investigation of occurrences, NokScoot has implemented a Just Culture process and flowchart to help ensure the consistent application of Just Culture across the company. The Meeting is invited to view the attached flowchart.

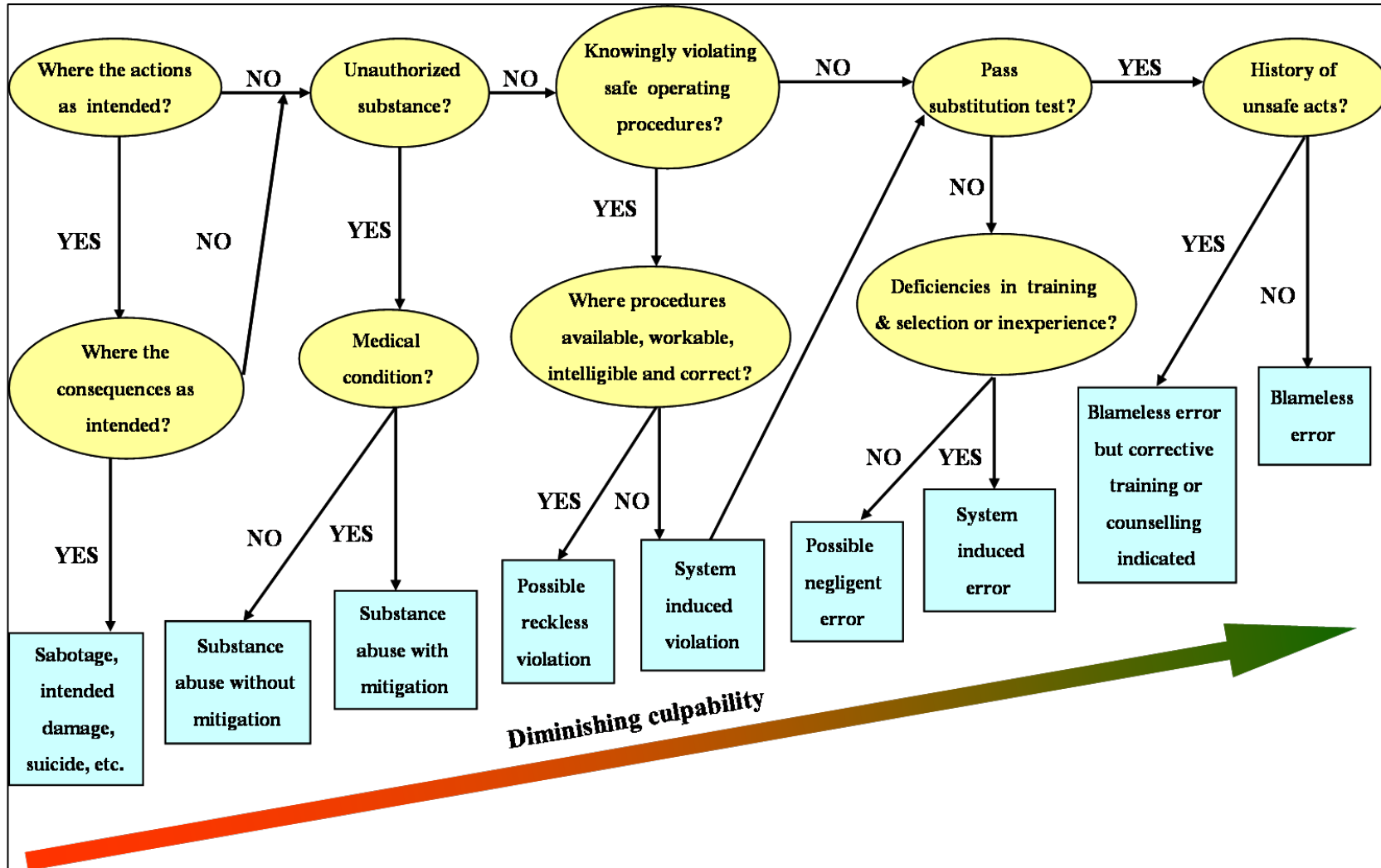
## **4. ACTION BY THE MEETING**

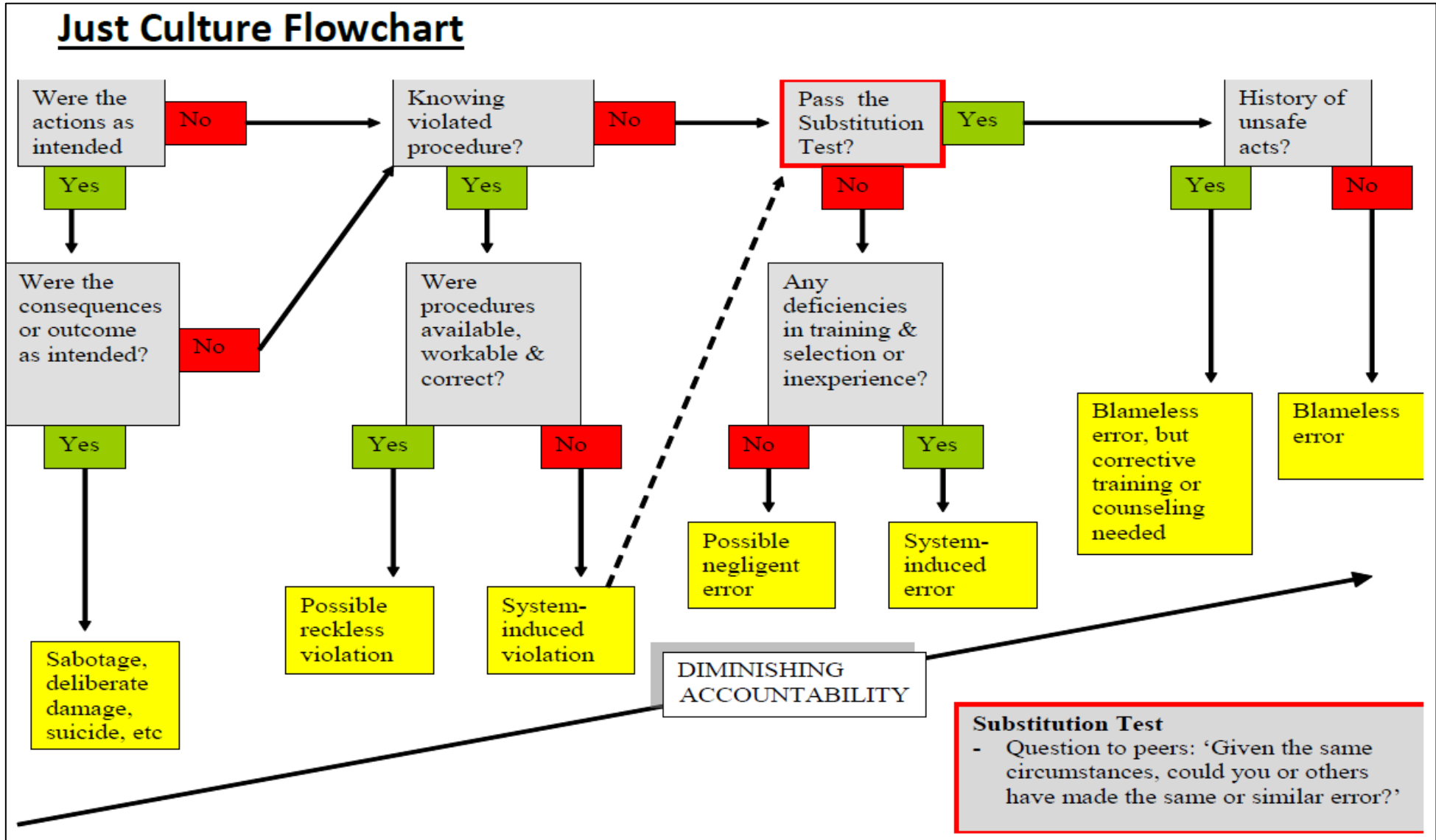
4.1 The meeting is invited to

- a) Start and continue the 'Just Culture' conversation in own organization;
- b) Consider the information in this paper to improve Just Culture; and
- c) Encourage States, operators, and service providers to share experience and lessons' learned in Just Culture.

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Culpability Decision Tree and Substitution Test by Dr. James Reason and Neil Johnston







**Error Classification and Remedial Action within a Just Culture**  
 (from ESARR’s Advisory Guidance Document - Establishment of Just Culture’ Principles in ATM Safety Data Reporting and Assessment)

Basic Classification	Detailed Classification		Example	Remedial Action Toward Individual
<b>Skill based</b> Failure in the performance of routine task that normally requires little conscious effort.	<b>Slips</b> An inadvertent action that is not adequate		- Unintended actions	No obvious solutions
	<b>Lapses</b> A temporary failure : a lapse of concentration		- Unintended failure to act	No obvious solutions
<b>Knowledge based</b> Failure to know what to do in a given situation (problem solving at conscious level). Errors occur when individuals are unable to apply their existing knowledge to new situations. Knowledge based errors may result in mistakes or violations.	<b>Mistakes</b> Intended actions giving a result different from expectation		- To be wrong about or to fail to recognize something or someone. - Wrong in what you believe, or based on a belief that is wrong. - An action, decision or judgement which produces an unwanted or unintentional result.	Training
		<b>Unintentional</b> People do not know how to apply the rule	- Non compliance - People act as if there is no procedure	Training
<b>Rule based</b> Failure to carry out a procedure or protocol correctly or choosing a wrong rule. Rule based errors may result in mistakes or violations.	<b>Violations</b> To break or act against something, especially a law, agreement principle or something that should be treated with respect	<b>Routine</b> Rules are broken because they are felt irrelevant or because people do not appreciate any more the dangers	- Cutting corners at every opportunity	Behavioral change
		<b>Optimizing</b> It is sometimes possible to get the job done faster, more conveniently or experience a thrill by not adhering to the rules	- Actions to further personal rather than strictly tasks related goals	Behavioral change
		<b>Necessary Situation</b> It is impossible to get the job done by applying the rules strictly	- Action that seem to offer the only path available to get the job done as rules/ procedures seem inappropriate for the present situation	Question the rules and work place
		<b>Exceptional</b> People have to solve the problem for first time and fail to follow good practice	- Totally unexpected situations	No obvious solutions