



**Agenda Item 7: Any Other Business**

**ICAO APAC ATM SAFETY CULTURE & JUST CULTURE SURVEY**

(Presented by the Secretariat)

**SUMMARY**

This paper provides and promotes information on the survey on ATM Safety Culture & Just Culture being conducted by ICAO APAC regional office.

**1. INTRODUCTION**

1.1 ICAO Annex 19 requires both States and ANSPs to promote a positive safety culture. The APAC Seamless ANS Plan (V3.0) also emphasises the importance of having an optimal aviation culture in organizations by allocating the Regional Priority 1 in ‘Just Culture’ in para 7.43 – ANSP Human and Simulator Performance.

1.2 In its role as a regional forum to support APAC member States/Administrations and also in support of safe recovery of air traffic from the COVID-19 pandemic impacts, the ICAO Asia and Pacific Regional Sub-Office has developed a survey to identify areas for improvement in ATM safety management activities for both States and ANSPs. The purpose of the survey is to promote a positive safety culture and just culture in the APAC region based on better understanding on the current status through this survey

**2. DISCUSSION**

Survey Questionnaire

2.1 Different from an assessment, the survey has been conducted to establish better understanding of the current status of implementation of ATM Safety Culture & Just Culture within the Asia/Pacific region, and to collect information to look for improvement areas and needs requiring more attention, so as to identify the focus area for both States and ICAO APAC regional office in promoting an ATM Safety Culture & Just Culture in the APAC region.

2.2 The survey questionnaire (**Attachment A to the State Letter Ref: AP069-22-RSO ICAO APAC ATM Safety Culture & Just Culture Survey**) asks on key elements of a positive safety culture based on desirable characteristics suggested by ICAO Doc 9859 – *Safety Management Manual*. The questions also survey on the policies and procedures States and service providers should establish and develop in regard to implementation of Safety Culture & Just Culture principles.

How to complete the survey

2.3 Two questionnaires were prepared, **Questionnaire one for APAC member States** to respond from a State’s perspective **by email**, and the other **Questionnaire Two online survey for**

**service providers** to be requested to respond **at: <https://forms.office.com/r/CyvBnTZjUE> no later than 10 June 2022.**

**3. ACTION BY THE MEETING**

3.1 The meeting is invited to:

- a) complete and submit the survey on ATM Safety Culture & Just Culture in accordance with **Attachment A** to this paper; and
- b) discuss any relevant matters as appropriate.

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## ICAO Asia/Pacific ATM SAFETY CULTURE & JUST CULTURE SURVEY

### Introduction

ICAO Annex 19<sup>1</sup> – *Safety Management* requires that “States shall take necessary measures, including the promotion of a positive safety culture, to encourage safety reporting through both mandatory and voluntary safety reporting systems to collect safety data and safety information”. Also, “the Service Provider shall define its safety policy reflecting organizational commitment regarding safety, including the promotion of a positive safety culture in accordance with international and national requirements”.

The *Asia/Pacific Seamless ANS Plan* emphasizes the importance of having optimal Aviation Culture & Just Culture by allocating Priority 1 to the regional element 7.43 (ANSP Human and Simulator Performance).

The purpose of this survey is to:

- establish better understanding of the current status of implementation of Safety Culture & Just Culture in Air Navigation Service Provider (ANSP) organizations in the Asia/Pacific (APAC) region; and
- identify areas of improvement areas and needs requiring more attention in promoting an ATM Safety Culture & Just Culture in the APAC region.

APAC States/Administrations are kindly requested to submit responses **by not later than 10 June 2022** as follows:

- **Questionnaire 1 (State)** – **One response per State or Administration** by email to [APAC-RSO@icao.int](mailto:APAC-RSO@icao.int), with a copy to [sqyang@icao.int](mailto:sqyang@icao.int), and;
- **Questionnaire 2 (Service Provider)** – **Each separate operational ANS organization** under the authority of State/Administration (as indicated in Question No.2 of Questionnaire 2), **to respond to the online survey at:** <https://forms.office.com/r/CyvBnTZjUE>.
  - ANS organizations should be encouraged to invite **as many as possible** of their personnel to complete Questionnaire 2.

**The following reference information may be found in the Appendix to this survey:**

- ICAO Doc 9859 *Safety Management Manual* – A positive Safety Culture features
- ICAO Doc 9859 Table 5 - Examples of actions that will enable or disable a positive safety culture
- APAC Seamless ANS Plan, paragraphs 5.12 – 5.22 and 7.43

Please review the reference information before answering the survey questions.

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<sup>1</sup> Annex 19 Sections 3.2, 3.5, 5.3, and Appendix 2 Section 1.1

**QUESTIONNAIRE 1: FOR STATE**

1. State/Administration:

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**What is Safety Culture?**

**Safety Culture** is the set of enduring values, behaviours and attitudes regarding safety, shared by every member at every level of an organization. It has been described as "how people behave in relation to safety and risk when no one is watching". Safety Culture has a direct impact on safety performance. (ICAO Doc 9859)

**Just Culture Policies** that distinguish **willful acts** of misconduct from **inadvertent errors**, providing for an **appropriate punitive or non-punitive response (a disciplinary policy)**, are **essential** to ensure the effective reporting of systemic safety deficiencies.

**Annex 19** requires that both States and ANSPs (Air Navigation Service Provider) promote a positive safety culture, also requires **States shall take necessary measures, including the promotion of a positive safety culture to encourage safety reporting through establishing a mandatory/voluntary safety reporting system.**

**A robust voluntary safety reporting system is often regarded as a key indicator of the safety culture maturity.**

2. Has your State established policies and procedures to support Safety Culture and Just Culture principles containing description of what's unacceptable behaviours and disciplinary actions thereon including relevant training policy, which is formally promulgated and made public?

Yes  No

other (Specify here)

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3. Within your State's legal/judiciary system, is safety data/information and the data/information sources sufficiently protected from external interference other than safety benefit?

Yes  No

4. Is your State developing systems and processes to support safety data sharing and periodic publication to provide easy access to safety information gathered by the safety reporting programmes?

Yes  No  have a plan to

5. Is your State aware of the need for an improvement plan and periodic assessments of safety culture?

Yes  No

6. Does your State assess its safety culture and disseminate the results throughout the State at least once every 5 years to establish a shared understanding of State's safety culture and identify its strengths and weaknesses?

Yes

No

7. If you have any other suggestions or comments, please indicate here.

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**Thank you for completing this survey, we appreciate your inputs.**

**QUESTIONNAIRE 2: ONLINE SURVEY FOR SERVICE PROVIDER**

at: <https://forms.office.com/r/CyvBnTZjUE> OR SCAN QR CODE



**PART A – GENERAL INFORMATION**

1. Please select your State:

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2. Please select your organization type.

- ATM (TWR, APP, ACC, ATFM)
- AIS/AIM provider
- MET/CNS service provider

3. Please describe your current work position

- Operational personnel
- Junior/middle/senior management in a Service Provider (ATM, AIS/AIM, MET, CNS, etc.)

**PART B – ATM SAFETY CULTURE & JUST CULTURE POLICY AND IMPLEMENTATION**

Please review the reference information in the appendix to this survey and answer the following questions:

**Safety Culture** is the set of enduring values, behaviours and attitudes regarding safety, shared by every member at every level of an organization. It has been described as "how people behave in relation to safety and risk when no one is watching". As per Annex 19, both States and ANSPs (Air Navigation Service Provider) shall promote a positive safety culture. The critical element for success is senior level support and commitment to create the right working environment and the right safety culture to optimize human performance. (ICAO Doc 9859)

**What is Just Culture?**  
 A Culture where front-line operators or other persons are **not punished for actions, omissions or decisions** taken by them **that are commensurate with their experience and training**, but in which **Gross Negligence, Willful Violations and Destructive Acts** are not tolerated.

**Just Culture Policies** that distinguish **willful acts** of misconduct from **inadvertent errors**, providing for an **appropriate punitive or non-punitive response (a disciplinary policy)**, are essential to ensure the effective reporting of systemic safety deficiencies.

**A robust voluntary safety reporting system is often regarded as a key indicator of the safety culture maturity, based on: trust, non-punitive, confidentiality, independent investigation, and easy reporting.**

4. Has your State established policies and procedures to support Safety Culture and Just Culture principles containing description of what's unacceptable behaviours and disciplinary actions thereon including relevant training policy, which is formally promulgated in a public domain?

- Yes                       No                       Maybe

5. Are policies and procedures in place that define safety culture i.e. a Vision/Mission Statement with a description of what effective safety looks like in your organization?

Yes                      No                      Maybe

6. Is safety an organization priority and a core value of your organization?  
(1 being Not likely/Never, 10 being Very likely/Always)

1	2	3	4	5	6	7	8	9	10
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. Are systems and processes in place to support safety data sharing and periodic publication to provide easy access to safety information gathered by the safety reporting programmes?

Yes                      No                      Maybe

8. Is your organization aware of the need for an improvement plan and periodic assessments of safety culture?

Yes                      No                      Maybe

9. Does your organization assess its safety culture and disseminate the results throughout the country at least once every 5 years to establish a shared understanding of organization's safety culture and identify its strengths and weaknesses?

Yes                      No                      Maybe

10. Does management's approach to safety demonstrate a genuine commitment to addressing safety issues by visibly endorsing and executing safety initiatives i.e. do they lead by example?  
(1 being Not likely/Never, 10 being Very likely/Always)

1	2	3	4	5	6	7	8	9	10
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. To what extent do you think all levels of your organization clearly understands and accepts the difference between acceptable and unacceptable behaviours, and disciplinary actions?  
(1 being Not likely/Never, 10 being Very likely/Always)

1	2	3	4	5	6	7	8	9	10
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12. Are safety risks and hazards faced by the organization properly well understood at all levels (up to and including senior managers)? (1 being Not likely/Never, 10 being Very likely/Always)

1	2	3	4	5	6	7	8	9	10
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13. Does your organization encourage staff to challenge procedures, practices and people to improve safety performance?

Yes                      No

14. Does your organization provide regular feedback to staff based on safety occurrence reports?

Yes                      No

15. Is there a formal process to inform staff who have reported a safety occurrence of the progress of the investigation?

- Yes                       No                       Maybe

16. Are high safety issue reporters formally praised and recognized/rewarded by your colleagues and organization?

- Yes                       No                       Maybe

17. If you report your own safety occurrences, do you expect you will be treated fairly in accordance with the principles of the Just Culture definition?

- Yes                       No

18. Do you feel your organization's hazard reporting system is efficient enough and easy to use?

- Yes                       No

19. Is voluntary reporting of hazard/safety issue valued and appreciated among colleagues and management level in your organization? (1 being Not likely/Never, 10 being Very likely/Always)

- |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                        | 2                        | 3                        | 4                        | 5                        | 6                        | 7                        | 8                        | 9                        | 10                       |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

20. Do you feel the safety issue will be resolved and corrected when you report? (1 being Not likely/Never, 10 being Very likely/Always)

- |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                        | 2                        | 3                        | 4                        | 5                        | 6                        | 7                        | 8                        | 9                        | 10                       |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

21. Are you comfortable with subsequent consequences when you report your own errors and/or mistakes? (1 being Not likely/Never, 10 being Very likely/Always)

- |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                        | 2                        | 3                        | 4                        | 5                        | 6                        | 7                        | 8                        | 9                        | 10                       |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

22. Do you feel that you are protected in legal accountability and job security when you report your own errors and/or mistakes? (1 being Not likely/Never, 10 being Very likely/Always)

- |                          |                          |                          |                          |                          |                          |                          |                          |                          |                          |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1                        | 2                        | 3                        | 4                        | 5                        | 6                        | 7                        | 8                        | 9                        | 10                       |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

23. If you have any other suggestions or comments, please indicate here.

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**Thank you for completing this survey, we appreciate your inputs.**

## ICAO APAC ATM Safety Culture & Just Culture Survey Reference

### 1. What is Safety Culture?

- **Safety Culture is** the set of enduring values, behaviours and attitudes regarding safety, shared by every member at every level of an organization. It has been described as "how people behave in relation to safety and risk when no one is watching". As per Annex 19, both States and ANSPs (Air Navigation Service Provider) shall promote a positive safety culture. Safety Culture has a direct impact on safety performance.

The critical element for success is senior level support and commitment to create the right working environment and the right safety culture to optimize human performance. (ICAO Doc 9859)

- **What is Just Culture?**

A Culture where front-line operators or other persons are **not punished for actions, omissions or decisions** taken by them **that are commensurate with their experience and training**, but in which **Gross Negligence, Willful Violations and Destructive Acts** are not tolerated.

**Just Culture Policies** that distinguish **willful acts** of misconduct from **inadvertent errors**, providing for an **appropriate punitive or non-punitive response (a disciplinary policy)**, are **essential** to ensure the effective reporting of systemic safety deficiencies.

- **A robust voluntary safety reporting system is often regarded as a key indicator of the safety culture maturity, based on: trust, non-punitive, confidentiality, independent investigation, and easy reporting.**

### 2. Features of a positive safety culture (ICAO Doc 9859 – *Safety Management Manual*)

- managers and employees, individually and collectively, want to **make decisions and take actions that promote safety**;
- individuals and groups **continually critique their behaviours and processes and welcome the critique** of others searching for **opportunities to change and improve** as their environment changes;
- management and staff share a **common awareness of the hazards and risks** faced by the organization and its activities, and the need to manage risks;
- individuals act and make decisions according to a common belief that safety is part of the way they do business;
- individuals value being informed, and informing others, about safety;
- individuals trust their colleagues and managers with information about their experiences, and the reporting of errors and mistakes is encouraged to improve how things are done in the future.

### 3. ICAO Doc 9859 Table 5. Examples of actions that will enable or disable a positive safety culture

Element and its General Description	Enablers	Disablers
<b>Commitment to safety</b> Commitment to safety reflects the extent to which senior management within the organization have a positive attitude	<ul style="list-style-type: none"> <li>• Management leads safety culture and is actively motivating its employees to care for safety, not only by talking but by acting as role models</li> <li>• Management provides resources for a range of safety</li> </ul>	<ul style="list-style-type: none"> <li>• Management is actively demonstrating that profit, cost reduction and efficiency come first</li> <li>• Investments to improve safety are often made when required by regulations or after accidents</li> </ul>

<p>towards safety and recognizes its importance. Senior management should be genuinely committed to achieving and maintaining a high level of safety and give employees motivation and the means to do so also.</p>	<p>related tasks (e.g. training)</p> <ul style="list-style-type: none"> <li>• Continuous safety management oversight and governance is established</li> </ul>	<ul style="list-style-type: none"> <li>• Neither oversight nor governance with regard to safety management is established</li> </ul>
<p><b>Adaptability</b> Adaptability reflects the extent to which employees and management are willing to learn from past experiences and are able to take action necessary in order to enhance the level of safety within the organization.</p>	<ul style="list-style-type: none"> <li>• Employee input is actively encouraged when addressing safety issues</li> <li>• All incidents and audit findings are investigated and acted upon</li> <li>• Organizational processes and procedures are questioned for their safety impact (high extent of self-criticism)</li> <li>• A clear proactive approach to safety is demonstrated and followed</li> </ul>	<ul style="list-style-type: none"> <li>• Employee input on safety issues is not sought from all levels of the employees</li> <li>• Actions are often taken only after accidents or when required by regulations</li> <li>• Organizational processes and procedures are considered adequate as long as no accident occurs (complacency or lack of self-criticism)</li> <li>• Even when an accident occurs the organization is unwilling to question itself.</li> <li>• A reactive approach to safety is demonstrated and followed.</li> </ul>
<p><b>Awareness</b> Awareness reflects the extent to which employees and management are aware of the aviation risks faced by the organization and its activities. From a State perspective personnel are aware of both the safety risks induced by their own activities and the organizations they oversee. Employees and management should be constantly maintaining a high degree of vigilance with respect to safety issues.</p>	<ul style="list-style-type: none"> <li>• An effective way of hazard identification has been established</li> <li>• Investigations seek to establish the root cause</li> <li>• The organization stays abreast of important safety improvements, and adapts itself accordingly as necessary</li> <li>• The organization systematically evaluates if safety improvements are implemented and working as intended</li> <li>• Where appropriate members of the organization are well aware of the safety risks induced by their individual actions and company operations / activities</li> </ul>	<ul style="list-style-type: none"> <li>• No effort is spent on hazard identification</li> <li>• Investigations stop at the first viable cause rather than seek the root cause</li> <li>• The organization does not stay abreast of important safety improvements</li> <li>• The organization does not evaluate if safety improvements are implemented properly</li> <li>• Where appropriate members of the organization are not aware of the safety risks induced by their individual actions and company operations</li> <li>• Safety data is gathered but not analysed and acted upon</li> </ul>
<p><b>Behaviour with respect to safety</b> Behaviour with respect to safety reflects the extent to which every level of the organization behaves such as to maintain and improve the level of safety. The importance of safety should be recognized and processes and procedures needed to maintain it should be put in place.</p>	<ul style="list-style-type: none"> <li>• The employees motivate themselves to act safely and by acting as role models</li> <li>• Continuous monitoring of safe behaviour is practiced</li> <li>• Intentional unsafe behaviour is not tolerated by management and colleagues</li> <li>• The working conditions support aviation safety at all times</li> </ul>	<ul style="list-style-type: none"> <li>• Employees are not punished for intentional unsafe behaviour to the benefits of their own or other interests</li> <li>• The working conditions provoke behaviour and work arounds that are detrimental to aviation safety</li> <li>• No monitoring of aviation safety within the organization's products or services is practiced</li> <li>• Constructive criticism to the benefit of aviation safety is not welcomed</li> </ul>
<p><b>Information</b> Information reflects the extent to which information is distributed to all necessary people within the organization. Employees should be enabled and encouraged to report aviation safety concerns and receive feedback on their reports. Work information related to aviation safety has to be communicated meaningfully to the right people in order to avoid miscommunication that could lead to hazardous aviation system situations and consequences. The State is open to share aviation safety related information to all service providers.</p>	<ul style="list-style-type: none"> <li>• An open and just safety reporting environment exists.</li> <li>• Employees are provided with safety-relevant information in a timely manner in order to allow for safe operations or decisions to be made.</li> <li>• Management and supervisors regularly check whether safety relevant information is understood and acted upon</li> <li>• Knowledge transfer and training with regard to aviation safety is actively practiced (e.g. sharing of lessons learned)</li> </ul>	<ul style="list-style-type: none"> <li>• A blaming safety reporting environment is evident</li> <li>• Safety-relevant information is withheld</li> <li>• Safety communication is not monitored for its effectiveness</li> <li>• No knowledge transfer or training is provided</li> </ul>

<p><b>Trust</b> Employee contribution to safety thrives in a reporting environment that fosters trust – trust that their actions or omissions, commensurate with their training and experience, will not be punished. A workable approach is to apply a reasonableness test – i.e. is it reasonable that a person with the same level of experience and training might do the same thing. Such an environment is fundamental to effective and efficient safety reporting. Effective safety reporting systems help to ensure that people are willing to report their errors and experiences, so that States and service providers have access to relevant data and information that is necessary to address existing and potential safety deficiencies and hazards. These systems create an environment in which people can be confident that safety data and safety information will be used exclusively for improving safety.</p>	<ul style="list-style-type: none"> <li>• There is a distinction between acceptable and unacceptable behaviour, which is known to all employees.</li> <li>• Occurrences (including accidents and incidents) investigations consider individual as well as organizational factors.</li> <li>• Good aviation safety performance is recognized and rewarded on a regular basis.</li> <li>• There is willingness among employees and operational personnel to report events in which they have been involved.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no identifiable distinction between acceptable and unacceptable behaviour.</li> <li>• Employees are systematically and rigorously punished for human errors.</li> <li>• Accident and occurrence investigations focus on individual factors only.</li> <li>• Good safety performance and safe behaviour is taken for granted.</li> </ul>
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**4. APAC Seamless ANS Plan (V3.0) para 5.12 – 5.22 Human Performance**



**Figure 6: Optimal Aviation Culture Factors (APAC Seamless ANS Plan V.3.0)**

**5. APAC Seamless ANS Plan (V3.0) para. 7.43 ANSP Human and Simulator Performance**

7.43 The following systems should be established to support human performance in the delivery of a Seamless ANS service. The systems should consider all the elements of the SHELL Model (Software, Hardware, Environment and Liveware – humans), in accordance with the ICAO Human Factors Digest No. 1 and related reference material:

- a) human performance training for all managers of operational air navigation services (such as aerodrome operators, ATC organisations and aeronautical telecommunications), such training to include the importance of:
- a proactive organisational culture where managers and operational staff are informed and safety is a first priority, using open communications and an effective team management approach;
  - assessment and management of risks by safety review and assessment teams comprising multidisciplinary operational staff and managers which review safety performance and assess significant proposals for change to ATM systems, particularly those related to human capabilities and limitations;
  - human factors in –
    - air safety investigation;
    - system design (ergonomics, human-in-the-loop);
    - effective training (including the improved application of simulators);
    - fatigue management;
    - automated safety nets; and
    - contingency planning;
  - effective safety reporting systems that –
  - are **non-punitive, supporting a ‘Just Culture’**;
  - promote open reporting to management; and
  - focus on preventive (systemic), not corrective (individual) actions in response to safety concerns, incidents and accidents.
- b) human performance-based training and procedures for operational staff providing ATS, including:
- the application of tactical, surveillance-based ATC separation;
  - control techniques near minimum ATC separation; and
  - responses to ATM contingency operations, irregular/abnormal operations and safety net alerts.

c) human performance-based training and procedures for staff providing operational air navigation services (such as aerodrome staff operating ‘airside’, air traffic controllers and aeronautical telecommunications technicians) regarding the importance of:

- **an effective safety reporting culture;** and
- **‘Just Culture’ (Priority 1).**

*Note 1: prevention of fatigue systems should be established to support human performance in the delivery of a Seamless ANS service. The systems should be consistent with guidance within ICAO Doc 9966 FRMS – Fatigue Risk Management System.*

*Note 2: regarding ATM contingency operations, refer to the Regional ATM Contingency Plan.*