



**WORKING PAPER**

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**Fifteenth Meeting of the Regional Aviation Safety Group – Pan America (RASG-PA/15) and Fifth RASG-PA–GREPECAS Joint Meeting (RASG-PA–GREPECAS/5)**  
Mexico City, Mexico, 2 to 4 March 2026

**Agenda Item 9: Enhancing Safety/Just Culture**

**ENHANCING SAFETY CULTURE THROUGH JUST CULTURE FRAMEWORKS: PRACTICAL ACTIONS AND THE RASG-PA AVIATION SAFETY ACTION PROGRAM (ASAP) STRATEGY**

(Presented by the PA-RAST)

**EXECUTIVE SUMMARY**

This working paper addresses the critical need to enhance Safety Culture across the Pan American Region by establishing its foundational enabler: Just Culture. The paper illustrates how Just Culture frameworks are the essential prerequisite for generating Safety Intelligence. By ensuring non-punitive protection, States and Operators unlock voluntary data streams that reveal "weak signals"—early precursors to hazards that mandatory reporting misses. To do this, States and Operators must move beyond reactive Mandatory Occurrence Reporting (MOR), which only captures the visible "tip of the iceberg," and unlock the hidden safety precursors—the "weak signals"—through the RASG-PA Aviation Safety Action Program (ASAP) Strategy. By ensuring administrative protection and implementing a consensus-based tripartite governance model, States and Operators can transform regional safety from reactive to proactive.

<i>Action:</i>	As suggested in Section 6.
<i>Strategic Goals 2026-2050:</i>	<ul style="list-style-type: none"> <li>• Every flight is safe and secure</li> </ul>
<i>References:</i>	<ul style="list-style-type: none"> <li>• ICAO Annex 19</li> <li>• RASG-PA ESC/40 — WP/03</li> <li>• FAA AC 120-66C</li> <li>• FAA Order 8900.1</li> </ul>

**1. Introduction**

1.1 To achieve the safety performance objectives of the Global Aviation Safety Plan (GASP), the Pan American Region must transition to proactively managing risks. This requires access to "weak signals"—data on precursors and hazards that occur in daily operations but often go unreported.

1.2 Some RASG-PA Safety Partners have identified a "persistent gap" in the adoption of non-punitive safety reporting in the region. This gap limits the proactive identification of hazards.

1.3 This paper explains that closing this data gap requires more than software or mandates; it requires a deliberate enhancement of Safety Culture through the specific mechanism of Just Culture.

## **2. Discussion**

### **2.1 Safety Culture vs. Just Culture: The Prerequisite for Intelligence**

2.1.1 Safety Culture refers to the values, attitudes and behaviors regarding safety shared by every member of an organization. A mature Safety Culture is informed, flexible and learning-oriented.

2.1.2 *Just Culture* is a specific component of Safety Culture. It defines the boundary between acceptable and unacceptable behavior, ensuring individuals are not punished for actions commensurate with their experience and training, while clarifying that gross negligence or willful violations are not tolerated.

2.1.3 You cannot have a Learning Culture without information and you cannot have information without Trust (Just Culture). Therefore, Just Culture is the prerequisite for a robust Safety Culture. Without the assurance of fair treatment, the flow of voluntary information dries up and the Safety Culture becomes "blind" to actual risk.

### **2.2 Beyond the Tip of the Iceberg: Unlocking Safety Intelligence**

2.2.1 Mandatory Occurrence Reporting (MOR) typically captures outcomes such as accidents or serious incidents. However, a non-punitive Just Culture environment encourages frontline personnel to voluntarily report errors and minor irregularities.

2.2.2 These voluntary reports reveal weak signals—subtle trends, procedural ambiguities, or latent conditions—that exist long before an accident sequence begins. By aggregating these weak signals, Safety Intelligence shifts from descriptive (what happened?) to predictive (what might happen?).

## **3. The Limitations of Standard SMS Voluntary Reporting**

3.1 Under a typical Safety Management System (SMS) framework, service providers are expected to enable a means for employees to communicate safety information to management without fear of reprisal. While most operators have internal Voluntary Safety Reporting (VSR) systems under their SMS, these programs often reach a performance plateau and low reporting rates.

3.2 These internal systems often suffer from a 'false sense of security' given that the lack of regulatory and legal integration leads to reports that prioritize minor technical glitches or administrative data while failing to disclose the latent conditions and procedural ambiguities that act as true precursors.

3.3 Key limitations include:

3.3.1 **Unilateral Governance:** Reports and safety data are typically analyzed only by the company safety department, often lacking frontline buy-in or independent oversight.

3.3.2 **Limited Protection:** SMS VSRs are internal company policies; they provide no formal protection against State administrative or certificate enforcement action.

3.3.3 **Reluctance to Report:** Employees are statistically less likely to report deviations involving regulatory non-compliance for fear of State sanctions, keeping critical precursors hidden from the regulator.

#### 4. The Value Proposition of RASG-PA Action Safety Action Program (ASAP)

4.1 The RASG-PA ASAP Strategy provides unique, multi-layered value that standard internal VSRs cannot replicate, serving as a viable option to meet SMS communication requirements.

4.2 The core advantages of the ASAP model include:

4.2.1 *Tripartite Legal Shield:* ASAP is governed by a formal Memorandum of Understanding (MOU) that contractually binds the Regulator (CAA), the Operator and Employee Groups (Unions) to shared Just Culture principles.

4.2.2 *Protection for Reporters:* For any report accepted by the program, the State formally agrees to forgo enforcement action. This incentive is the primary engine of trust that internal company policies cannot offer.

4.2.3 The success of an adopted ASAP relies on a flexible reporting framework that prioritizes safety intelligence over administrative rigidity. Consistent with proven international practices (e.g., FAA AC 120-66C and FAA Order 8900.1), report acceptance is governed by the quality of the information provided.

4.2.4 *Consensus-Based Analysis:* An Event Review Committee (ERC), featuring representatives from all three parties, must reach a unanimous consensus on all decisions. This ensures corrective actions are technical, fair and focused on systemic health.

4.2.5 *ERC Discretion:* The ERC is granted the discretion to evaluate the timeliness of a report as a criterion for acceptance. This allows the committee to accept reports that may fall outside traditional windows if doing so is determined to be in the "best interest of safety".

4.2.6 *Sole Source Protection:* Timeliness considerations do not apply to sole-source reports, which are events where the only evidence of the occurrence is derived from the ASAP report itself. This fundamental protection ensures that any previously unknown risk brought to light is fully protected, encouraging maximum transparency and the reporting of hazards that would otherwise remain hidden from the State.

4.2.7 *Discovery of "Unknown" Risks:* ASAP incentivizes the self-disclosure of regulatory non-compliances, transforming hidden risks into actionable intelligence for the entire region.

## 5. Practical Actions for States and Operators

### 5.1 *Action 1: The Regulator – Establishing the Legal Foundation*

5.1.1 States must review national regulations to ensure they protect the identity of reporters and prevent the content of voluntary reports from being used for enforcement or judicial proceedings in cases of unintentional error.

### 5.2 *Action 2: The Tripartite Establishing the "Line in the Sand" – Defining Accountability*

5.2.1 The establishment of a clear boundary between protected errors and excluded behaviors is a joint responsibility of the Regulator, the Operator and Employee Groups. This "Line in the Sand" must be contractually defined within the MOU to ensure that all parties agree on the criteria for administrative immunity. Excluded behaviors typically include criminal activity, substance abuse, intentional falsification, or reckless conduct.

### 5.3 *Action 3: Implementation via the RASG-PA ASAP Strategy*

5.3.1 The strategy provides the Implementation Guidance and MOU templates necessary to operationalize these concepts. It provides a "safe harbor" where Regulators and Operators can learn to collaborate on risk rather than contend on enforcement.

## 6. Suggested Actions by the Meeting

6.1 The Meeting is invited to:

- a) Review the dependency of Safety Intelligence on "weak signals" provided by voluntary data enabled by Just Culture-based Voluntary Safety Reporting Program such as ASAPs;
- b) Discuss how Just Culture frameworks, specifically the Consensus-based ERC model, serve as the essential mechanism to unlock these data streams;

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- c) Reaffirm the RASG-PA ASAP Strategy as the regional mechanism for enhancing safety culture; and
- d) Recommend that more States volunteer to join the RASG-PA ASAP Pilot Project to improve the generation of safety intelligence in the RASG-PA region.

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