



International Civil Aviation Organization

**Middle East Air Navigation Planning and
Implementation Regional Group**

**Fifteenth Meeting (MIDANPIRG/15)
(Bahrain, 8 – 11 June 2015)**

Agenda Item 4.2: Air Navigation Safety related issues

**NON-PUNITIVE REPORTING PROCESSES AND PROTECTION OF SAFETY
INFORMATION**

(Presented by CANSO)

SUMMARY

This working paper presents the CANSO *Guidelines on Just Culture* that help its membership foster its introduction in their organisations. It is recognised that staff safety reports are one of the most valuable sources of information for learning safety lessons and therefore there is a need to foster a culture in which staff feel secure that the organisation will treat them justly and fairly when they report. Such a policy should be further bolstered by laws and regulations that ensure protection of safety information and their sources, in line with the amendment proposals for new provisions based on the work of the Safety Information Protection Task Force (SIP TF).

1. INTRODUCTION

1.1 Non-punitive reporting processes and protection of safety information and systems are essential to support accident and incident investigation and safety management processes. CANSO therefore published *Guidelines on Just Culture* (see Attachment A), which states that staff safety reports are one of the most valuable sources of information for learning safety lessons. In order to receive as many reports as possible, organisations must foster a culture in which staff feel secure that the organisation will treat them justly and fairly when they report. This fairness must extend to circumstances where staff may feel concern that reports of their own actions could result in blaming and/or disciplinary action, while not tolerating negligence, deliberately unsafe acts or reckless behaviour. The CANSO *Guidelines on Just Culture* further states that individual organisations should have a clearly defined Just Culture policy supported by a set of principles that help to deliver the policy. The policy should be bolstered by laws and regulations that ensure protection of data and ANSP employees.

2. DISCUSSION

2.1 The publication of ICAO Annex 19 – *Safety Management*, in July 2013, included Chapter 5, Safety Data Collection, Analysis, and Exchange, and more specifically section 5.3 – *Safety data protection* and Attachment B – *Legal Guidance for the Protection of Information from Safety Data Collection and Processing Systems*. These provide the Standards and Recommended Practices (SARPs) as well as guidance to assure the appropriate use and protection of information gathered through safety management processes. This is a positive step forward in balancing the need to protect safety information and their sources and the need for the proper administration of justice. Implementation of these new

provisions will help support the development of proactive safety management practices and a Just Culture as promoted by the CANSO *Guidelines on Just Culture*. An environment in which operational personnel are constantly encouraged to report hazards, and feel comfortable doing so, will result in a positive safety culture and effective safety occurrence reporting. In this way, the CANSO *Guideline on Just Culture* will help support the implementation of new and enhanced ICAO provisions related to the protection of safety information and its related sources.

3. CONCLUSIONS

3.1 CANSO Member ANSPs recognise that staff safety reports are one of the most valuable sources of information for learning safety lessons and therefore feel the need to foster a culture in which staff feel secure that the organisation will treat them justly and fairly when they report. CANSO has therefore issued its *Guidelines on Just Culture* to help its membership foster a Just Culture environment in their organisations. The new and enhanced ICAO provisions related to the protection of safety management information and their sources support the development of proactive safety management practices and a just culture.

3.2 As emphasised in WP/4, it is now important that the implementation of these new and enhanced provisions on the protection of safety information and their sources is supported by appropriate communication and training initiatives involving industry. CANSO stands ready to do what it can to assist in the roll-out activities in support of the implementation of the new and enhanced ICAO provisions.

4. ACTION BY THE MEETING

4.1 The meeting is invited to note the information in this paper.

CANSO GUIDELINES ON JUST CULTURE

1. PURPOSE

1.1 CANSO Members are committed to maintaining and, where possible, improving safety. To achieve this, we recognise staff safety reports as one of the most valuable sources of information for learning safety lessons. Therefore, in order to receive as many reports as possible, organisations must foster a culture in which staff feel secure that the organisation will treat them justly and fairly when they do report. This fairness must extend to circumstances where staff may feel concern that their report could implicate themselves because of their actions. This document therefore provides guidelines to the CANSO membership on fostering a Just Culture in its organisations.

2. CANSO MEMBERSHIP ORGANISATIONS WILL FOSTER A JUST CULTURE IN ORDER TO ACHIEVE:

2.1 *Staff Responsibility* – Just Culture means openly reporting and discussing safety issues and mistakes while accepting that we must be individually held to account for our actions. All our staff are responsible for acting safely in a manner which is commensurate with their training, experience, and the professional standards expected in their job. They adhere to written procedures unless, in the clear interest of safety, it is necessary to deviate from these procedures. Where such deviation is required, staff will be given full and fair opportunity to account for their actions.

2.2 *Organisational Responsibility* – Individual organisations should have a clearly defined Just Culture Policy. This policy should be supported by a set of procedures, which help to deliver the policy. All staff are recognised for the role they play in delivering a safe service to our customers. We will provide staff with the appropriate environment, tools, training and procedures required to perform the job. We will encourage all staff to demonstrate the appropriate safety attitude and safe behaviour at all times. We will aim to manage our organisations in such a way that staff will not be put in situations where safety is compromised because of organisational factors.

2.3 *Safety Reports* – We are clear with all our staff that successful safety management relies on the knowledge and expertise of front line operators. We need to know about all situations which were, or potentially could have been, or may become, unsafe. In line with staff responsibility, it is the professional duty of all staff to bring to light any situation which they believe to be dangerous or potentially harmful. This requires organisations to explicitly understand that staff may occasionally make mistakes or errors of judgment which could lead to unsafe outcomes.

2.4 *Protection and support* – When it becomes apparent that someone has made an error, we will neither assume nor seek to find personal fault or guilt. Staff will not be punished simply for making an honest mistake. We will protect our staff as far as possible from negative consequences resulting from mistakes and errors or subsequent investigations and, in principle, we will defend and support our staff if they should be subject to external prosecution or litigation.

2.5 *No tolerance for unacceptable behaviour* – We are committed to a “Just Culture” work environment. We do not tolerate gross negligence, deliberately unsafe acts or recklessness from our staff, regardless of the outcome. We set clear expectations with our staff regarding professional attitudes and behaviour. We make explicit where the boundaries are between acceptable and unacceptable behaviour. We agree with our staff what the consequences are if these boundaries are crossed.