Safety Evolution Guide:

Just Culture

Evolution Guide based on an SMS practice that has been recognised as Optimised by the CANSO Safety Standing Committee

1. OBJECTIVE OF GUIDE

Members of the Civil Air Navigation Services Organisation (CANSO) are committed to the improvement of their services. As part of this commitment, organisations share their practices in efforts to transfer learning across the industry.

This guide captures:

- the practices of an Air Navigation Service Provider (ANSP) in one element of the CANSO Standard of Excellence (SoE) in Safety Management Systems (SMS). The practices of this ANSP have been recognized by their peers as being an optimised practice within the industry (see Figure 1).
- the optimized practices have been selected on the basis of their novelty, innovation or the recognition of their potential to manage operational risks; or
- proposed practices that are based on contemporary thinking in the safety management sphere. These proposals have yet to be fully adopted by any ANSP, but they are viewed by the CANSO Safety Standing Committee (SSC) as having significant potential in the industry's efforts to evolve how safety is managed.
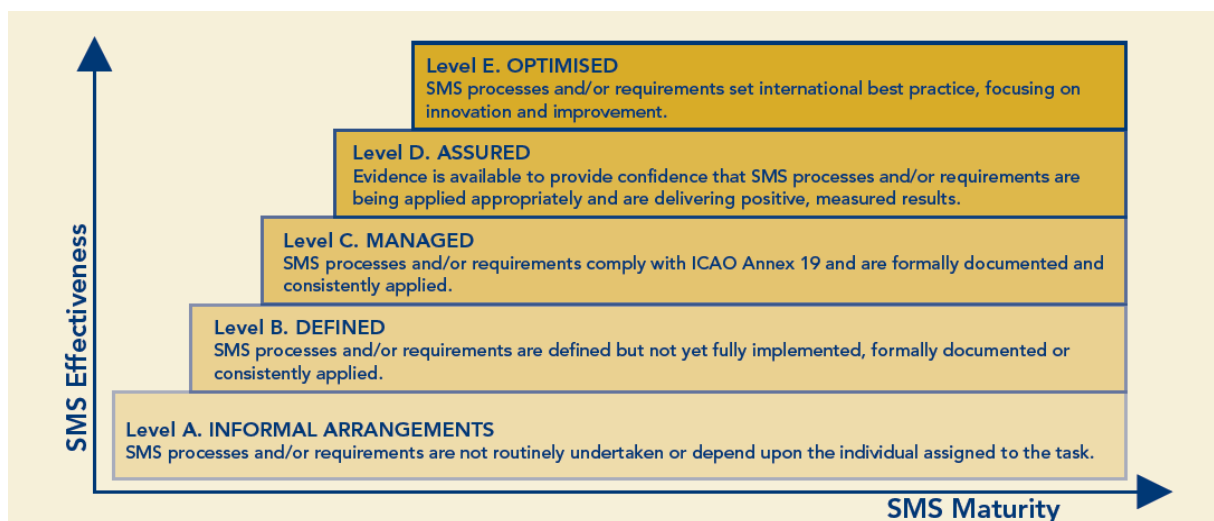

Figure 1. CANSO Standard of Excellence – Maturity Pathway

Given the dynamic nature of safety management, the practices presented in this document may be superseded. CANSO will publish updated best practice guidance.

2. APPLICATION OF THE GUIDANCE

CANSO recognizes that this guidance will not be relevant to all ANSPs. The maturity of any ANSP's Safety Management System will be dependent on their specific context. This context will be a reflection of factors including the size and complexity of the organisation, domestic regulations and the risk appetite of the organisation.

ANSPs do not necessarily need to adopt all the practices and processes promoted by CANSO, but consider the relevance of the practices promoted in this guide to their operational environment.

3.   OPTIMISED PRACTICE

This guide addresses an SMS process that was identified in 2019 as being optimised. It details how one ANSP, Airservices Australia, designed and implemented an integrated just culture approach to improve the climate for the open reporting and investigation of occurrences. The approach was reviewed by a panel of experts from the Future Safety Working Group of the SSC. The approach meets the CANSO standard for Development of a Positive and Proactive Safety Culture (see below).

4.   SCOPE OF GUIDE

This guide provides insight into how Airservices Australia (Airservices) integrated its existing safety-focussed just culture framework across its business; refreshed its workforce's understanding of just culture principles; demonstrated leadership commitment to just culture; and provided support for just culture decision making. This guide outlines the approach taken, the benefits achieved, as well as lessons learnt during implementation.

5.   APPLICABLE STANDARDS

CANSO Standard of Excellence in Safety Management Systems

1. Development of a Positive and Proactive Safety Culture

Objective	Informal Arrangements	Defined	Managed	Assured	Optimised
1.2 A just and open climate for reporting and investigation of occurrences NB: Thorough reporting and investigation must include the complete process from notification, data gathering, reconstruction, analysis, safety recommendation and implementation of remedial actions, up to final reporting, exchange of lessons learned and effective monitoring.	Management believes there are no issues regarding the existing reporting and investigation culture and therefore does not see the need for any activity or dialogue with the staff in this area.	Discussions between staff and management to define a just and open reporting and investigation climate are underway. However, no agreed policy and procedures are in place yet.	Policy and procedures which support an open reporting climate, and Just Culture principles are in place. Safety data-sharing and publication policies are supported by the staff. Safety data are sufficiently protected from external interference within legal limits.	Within the organisation, the line between acceptable and unacceptable behaviours is established and is known and accepted by the all levels in the organisation. Just culture reporting and investigation principles and processes are systematically applied within organisation.	Under certain legal regimes, there is a clear and published policy on how dialogue with judicial authorities and media is established and followed. As the organisation changes and evolves, the organisation sustains and maintains its Just Culture approach. Lessons from within the organisation and different industry sector are used to enhance to organisation's approach to Just Culture.

Figure 2. Extract from CANSO Standard of Excellence in Safety Management Systems, November 2015

6.   ORGANISATIONAL CONTEXT

Airservices has had a Just Culture Policy in place for over a decade and although the policy is not written in a safety-specific manner, the principles have long been interpreted in this context. Over this time, several awareness campaigns have been implemented in order to improve understanding an application of just culture, with varying levels of effectiveness.

7.   JUST CULTURE SCOPE

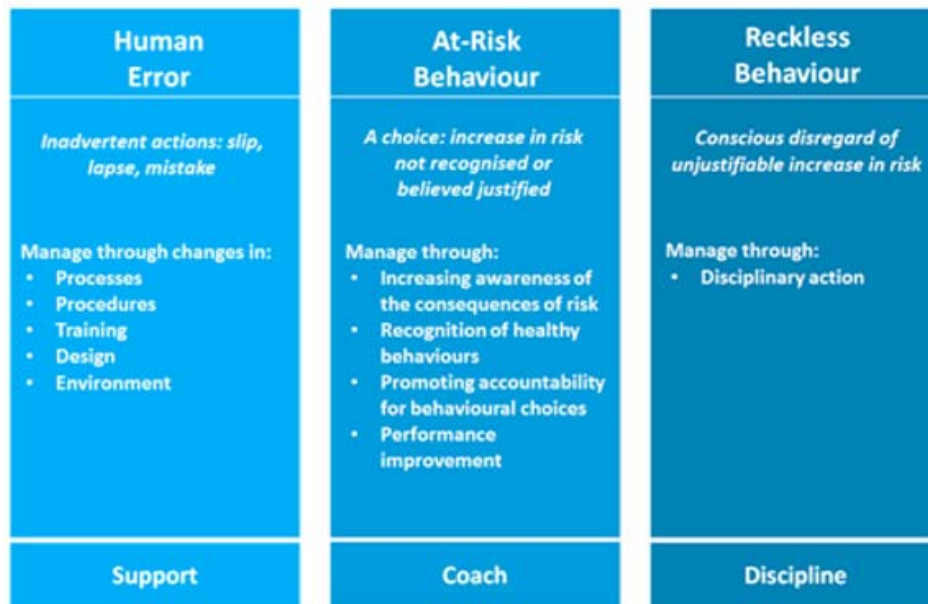Airservices has adopted a three tiered just culture approach (Figure 3), based on the Outcome Engenuity model.

Figure 3. Airservices Just Culture Model

In applying this model, Airservices has promoted that these just culture principles apply to all functions, both operational and non-operational and whether safety related or otherwise.

8.   OUR JUST CULTURE PROGRAM

The acceptance of just culture principles outside of the safety domain was a key objective of the *Our Just Culture* program, implemented by Airservices, in order to ensure their consistent application, refresh staff understanding and strengthen application within the safety domain. Demonstration of leadership commitment was also seen a key requirement in the success of the program and the effective application of the principles.

8.1.   CROSS-FUNCTIONAL TEAM

In order to avoid further inference that just culture is a safety specific concept, Airservices established a cross-functional team to lead the *Our Just Culture* program. The team consisted of safety, people and leadership, and communications specialists. Governance arrangements for the program were also established in a cross functional fashion, with the steering group including representation from senior leaders accountable for policies, strategies, programs and systems in the domains of people, leadership and organisational development, safety, health, environment and security.
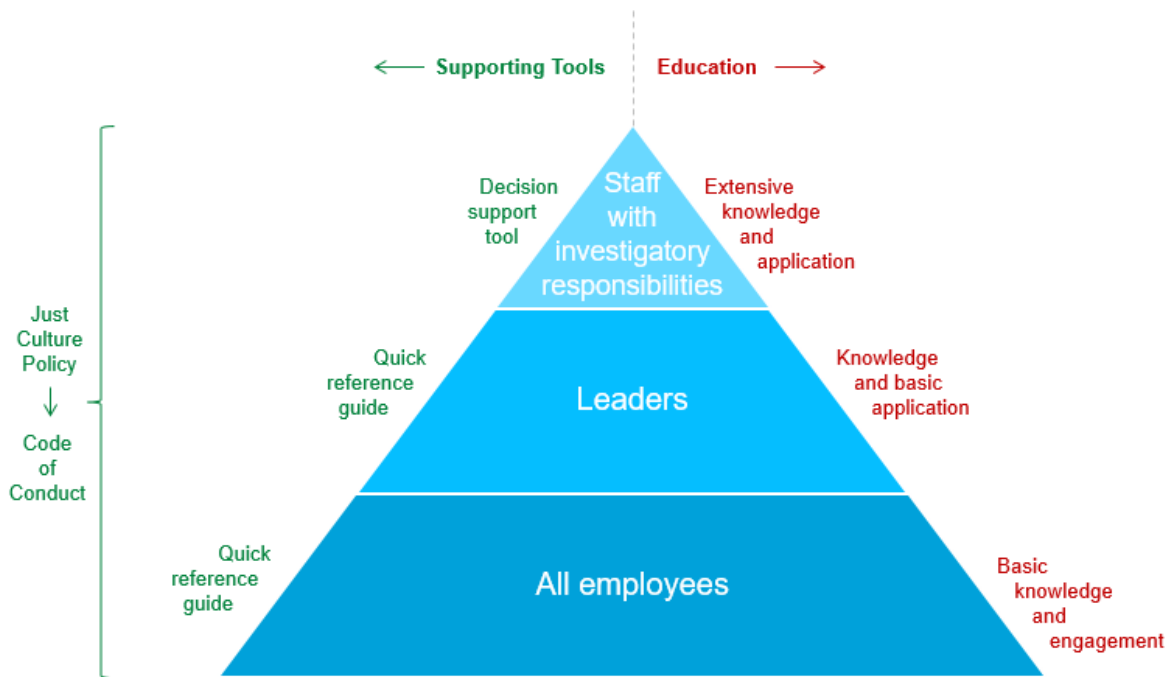
8.2. PROGRAM OVERVIEW

Figure 4. Airservices 'Our Just Culture' Program

The Airservices *Our Just Culture* program identified three key audience groups and aimed to provide a corresponding appropriate level of education and appropriate supporting tools for each group (Figure 4). The approaches taken for each group are described throughout the following sections.

Along with this tiered approach, the program also included a significant re-drafting of the Airservices Code of Conduct to explicitly call out our Just Culture approach. While nothing in the existing Code of Conduct was in conflict with the principles, this explicit linkage was seen as an important step in shifting the perception of just culture from a safety concept to a people concept.

8.3. ALL EMPLOYEES

The Airservices approach for all employees was to provide a basic level of knowledge regarding just culture principles and to focus communication efforts on engaging the workforce in the topic as a means of 'getting the conversation started'.

Review of previous attempts to communicate just culture principles revealed that theory and principle heavy communications had repeatedly failed to engage workforces on the topic.

To move towards this engagement approach, Airservices produced just culture promotional videos featuring members of the Airservices Executive team recreating popular television ads and highlighting the just culture themes within them. This tongue-in-cheek approach was able to demonstrate senior leadership commitment, through their

willingness to go outside of their comfort-zone in support of the program. The approach proved popular with Airservices staff and provided a great talking point and means to prompt further discussions as to the principles of Just Culture at facilitated staff roadshows.

Further feedback regarding previous just culture promotional campaigns indicated that printed promotional materials, while well received by corporate staff, were lost on operational staff without desks on which to place them. To overcome this, Airservices produced Just Culture coasters (Figure 5) and distributed them to operations rooms and towers to be placed on consoles (as well as to all corporate staff). Again, this material was deliberately light on theory and principles and rather aimed at engaging staff in the just culture conversation and linking the principles to the Airservices values.
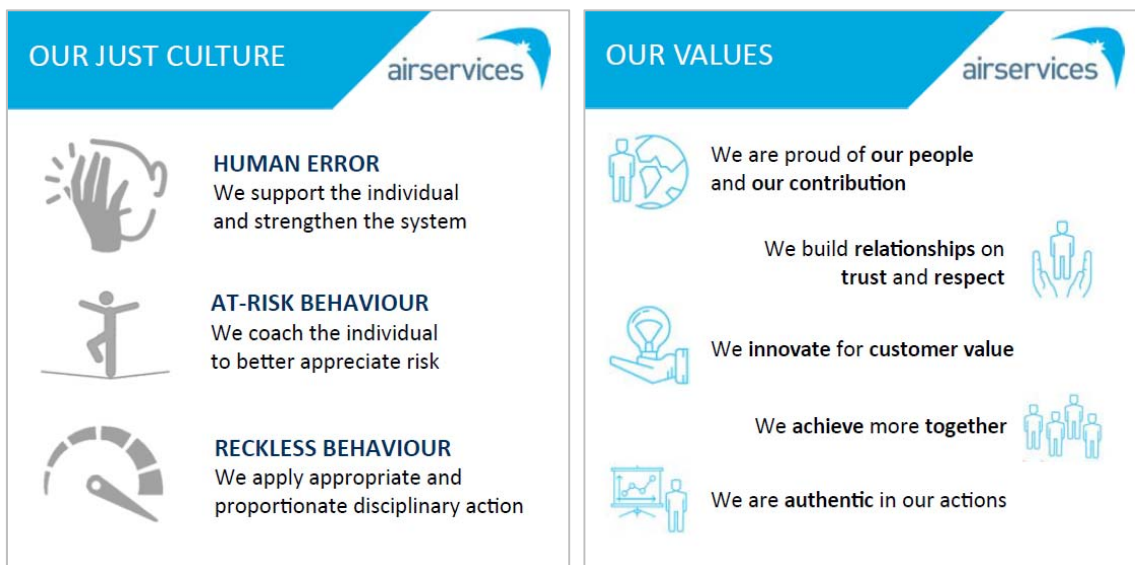
Figure 5. Just Culture coasters (front and back)

To further this employee awareness through slightly more in-depth discussion and further demonstrate commitment at the line leadership level all leaders were asked to have just culture discussions with their teams. To facilitate this, Airservices prepared as part of its program a presentation and facilitator guide for line leaders to use as the basis for the conversation, including a quick reference guide (Figure 6) with actions staff can take to embed just culture in their everyday working.

OUR JUST CULTURE

airservices

WHAT IS JUST CULTURE?

PRINCIPLE ONE
Just Culture supports our Code of Conduct and is key to enabling a positive workplace culture at Airservices.

PRINCIPLE TWO
We acknowledge that systems are flawed and that people make mistakes. We must learn from these gaps and mistakes to continuously improve. We must also acknowledge that people need to make positive behavioural choices.

PRINCIPLE THREE
Having a Just Culture allows for open and honest reporting when things go wrong by assuring consistent, transparent and just treatment, through objective and open investigation.

WHO DOES IT APPLY TO?

Our Just Culture applies to everyone at Airservices.

WHAT IS OUR APPROACH?

In the event of a deviation from expectations or service levels (an occurrence), we apply a three-tiered approach.

HUMAN ERROR
Inadvertent actions, like mistakes and lapses in attention that may lead to unintended outcomes.

Response: Supporting the individual and improving the system that allowed the error.

AT-RISK BEHAVIOUR
Choice of behaviour that unjustifiably increases risk, due to failing to appreciate the risk or believing it to be justified.

Response: Coaching the individual to increase appreciation of risk.

RECKLESS BEHAVIOUR
Conscious disregard of unjustifiable risk.

Response: Appropriate and proportionate disciplinary action.

WHAT IS MY ROLE?

REPORT occurrences through appropriate channels

LEAD by example to encourage reporting, team work and learning lessons from occurrences

SUPPORT those around me when error occurs

FOSTER an understanding of the risk within your area of responsibility

PROMOTE the need to be accountable for making positive behavioural choices

CONTRIBUTE to improving the robustness and resilience of our systems and processes

UNDERSTAND why occurrences happen, focussing on systemic factors

SHARE learnings throughout your team and across the organisation

RESPOND to occurrences in a considered and informed manner

A Just Culture supports our values, enables shared understanding of expectations and facilitates trust

We are proud of our people and our contribution | We build relationships on trust and respect | We innovate for customer value | We achieve more together | We are authentic in our actions

Figure 6. Just Culture actions

8.4.   LEADERS

Airservices conducted an in-person half-day workshop with the full Airservices leadership cohort. The workshop included discussion of the desired end-state as well as some of the organisational metrics that had indicated room for improvement in this area and hence driving the need for the work. The cohort was also taken through high-level case studies in order to familiarise themselves with application of the principles at the everyday decision making level.

This approach ensured a consistent level of understanding across the full cohort and was also a key component in the demonstration of leadership commitment previously discussed.

8.5.   STAFF WITH INVESTIGATORY RESPONSIBILITIES

In order to ensure the ongoing work to increase understanding of and engagement in just culture was not undermined by inconsistent investigation outcomes, Airservices conducted a significant training program on just culture application in occurrence investigation. The training audience was all staff involved in either the conduct of, or acceptance of the outcomes of, investigations. This included investigations into occurrences related to safety (operational and workplace), security, environment, ethics and fraud, and code of conduct.

The training focussed on a more in-depth understanding of the just culture principles, including application to a number of detailed case studies and introduced the use of the Just Culture Decision Support Tool as a mechanism to drive and document repeatable consistent results when making decisions regarding Just Culture related matters.

The Airservices Just Culture Decision Support Tool (Appendix A) was developed to, in the event of a deviation from expectations or service levels (e.g. an incident), tease out factors relating to individuals' intent, risk awareness and behaviour as well as the organisation's systems and responses. The interaction of each of these considerations will then indicate a potentially appropriate[1] action that is consistent with the Airservices Just Culture Model.

9.   SUMMARY

This guide provides an example of how one ANSP has sought to improve the understanding and consistency of application of just culture principles, not only within a safety context, but across all business functions.

Like all safety management practices, approaches to application of just culture must be tailored to the specific operations and requirements of the ANSP and the program outlined within this guide may not be appropriate for all ANSPs. This guide seeks to

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[1] The indicated action is a guide and must only be considered based on the individual situation's context and circumstances

provide practical guidance and lessons learnt for ANSPs seeking to improve their application of just culture principles.

The primary keys to the success of this program were the implementation of an engagement and discussion focussed approach with employees, and the demonstration of leadership commitment throughout all levels of Airservices.

APPENDIX A – JUST CULTURE DECISION SUPPORT TOOL

Airservices Just Culture Decision Support Tool

Intention

Did the individual intend to cause harm?

consider whether there was a conscious objective to deviate from objectives or a reduction in service levels or damage to reputation or business

Did the choice of behaviour or action result in an unjustified increase in risk?

consider whether the increase in risk associated with the choice of behaviour or action outweighed the benefit

Risk Awareness

Did the individual consciously disregard the increase in risk?

consider whether the increase in risk was recognised, however a conscious decision was made to disregard it

Should the individual have known they were increasing risk unjustifiably?

consider whether a similarly situated person would have seen and appreciated the increase in risk

Behaviour

Did the individual choose to deviate from established procedures and practices?

consider whether the behaviour was deliberate, rather than an inadvertent error or mistake

Were procedures and systems appropriate for the situation?

consider whether Airservices systems and procedures contributed to or solicited the behaviour or action

Organisational Systems and Responses

Does the individual have a history of this type of error, mistake or at-risk behaviour?

consider any relevant behavioural trend of the individual.

Has Airservices addressed the individual's previous errors, mistakes or at-risk behaviour effectively?

consider the effectiveness of any previous Airservices actions taken to address the issue

Does the individual lack the capability to continue in the specific role?

consider whether the individual fails to consistently demonstrate required capability for the specific role leading to the error, mistake or at-risk behaviour

Indicated action

the actions indicated below are a guide and must only be considered based on the individual situation's context and circumstances

In the event of a deviation from expectations or service levels

START

No / Yes

Indicated actions (right column, top to bottom):
- System Modification and Supporting
- System Modification and Coaching
- Supporting
- Perf. Improvement and Coaching
- Alternative Duties
- System Modification and Coaching
- Coaching
- Perf. Improvement and Coaching
- Alternative Duties
- System Modification and Coaching
- Coaching
- System Modification and Coaching
- Coaching
- Perf. Improvement and Coaching
- Alternative Duties
- Disciplinary Action

ALTERNATIVE DUTIES: the reassigning of the individual to duties that are more suited to their capabilities.

AT-RISK BEHAVIOUR: a choice that unknowingly increases risk unjustifiably, through a failure to recognise, or appreciate the extent of, the increase in risk.

COACHING: a constructive and positive intervention program to increase the individual's risk awareness and/or improve behavioural choices.

DISCIPLINARY ACTION: refer to the Code of Conduct Management Instruction (MI-0431).

PERFORMANCE IMPROVEMENT: action taken to aid the individual to better perform their role, in accordance with the Performance Improvement Procedure (HR-PROC-0028).

SUPPORTING: a conversation that acknowledges the event, the employee's contribution (both causal and mitigative), the emotions of the employee and seeks to provide appropriate support.

SYSTEM MODIFICATION: action taken to address issues within the system that may have contributed to the outcome or solicited the behaviour.

UNJUSTIFIED INCREASE IN RISK: an increase in the level of risk of such an extent that the benefit would no longer justify the risk.

Airservices Just Culture Decision Support Tool – Additional Information

The Airservices Just Culture Decision Support Tool is to assist managers' decision making in the event of an adverse outcome for Airservices and to assure transparency in decision making to employees involved. The tool assists with the determination of an appropriate outcome in accordance with the organisation's Just Culture Policy (C-POL0028). The decision support is provided as guidance only, based on Just Culture principles, and the context and individual circumstances of any issue to which it is applied must be taken into account before any action is taken.

Any action taken must be done so in accordance with Airservices Work Performance and People Management systems.

Key
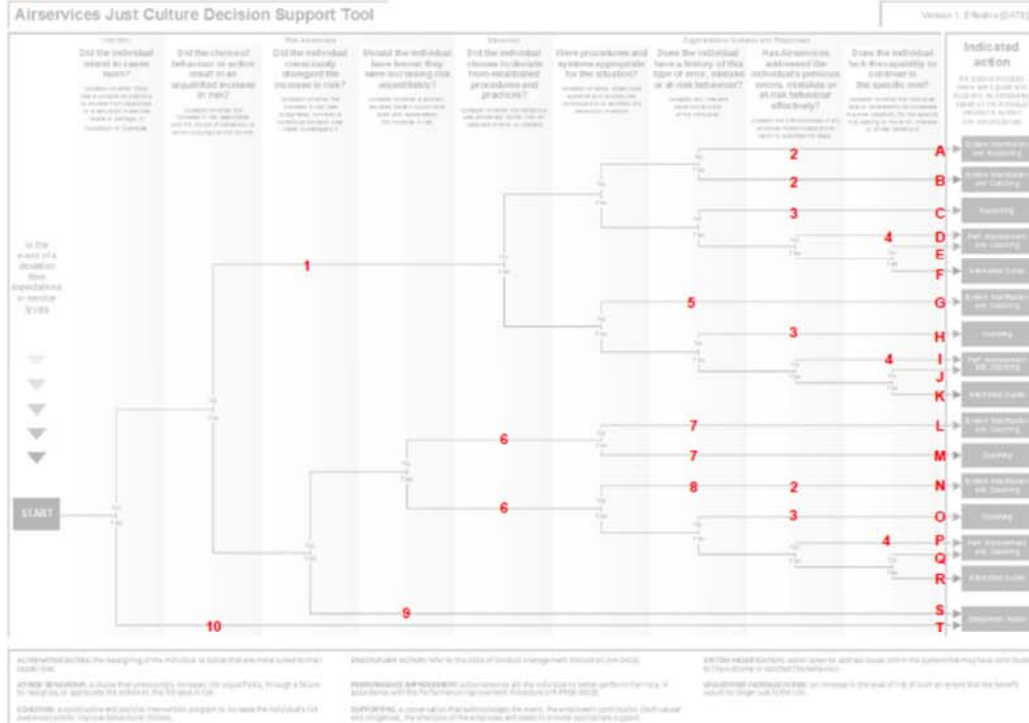
Tree Logic

Along some branches of the tree, certain answers can make subsequent questions irrelevant. Where this is the case, the tree continues through the question without branching and the applicable logic is described below. However, in each case, it may still be useful to give consideration to question within the context of the situation under consideration.

1 - Not applicable given there was no decision resulting in unjustified increase in risk

2 - System fitness-for-purpose must be addressed before these are considered

3 - Not applicable where there is no relevant behavioural trend

4 - History must have been addressed before capability can be considered

5 - Question doesn't change actions as established procedures or practices were disregarded

6 - Any deviation must have been unintentional given the increase in risk was not recognised

7 - Not applicable for situations where the increase in risk was not recognisable

8 - Question doesn't change actions as the increase in risk should have been recognised

9 - If there was conscious disregard for an unjustified increase in risk then no further considerations need be made

10 - If harm was the intention then no further considerations need be made

Scenario Descriptions

A - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, made an error or mistake. The systems in place were inappropriate for the scenario and the employee has no history of system induced errors or mistakes.

B - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, made an error or mistake. The systems in place were inappropriate for the scenario, however the employee has a history of system induced errors or mistakes.

C - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, made an error or mistake that they have no history of.

D - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, made an error or mistake that they have a history of but that the organisation has not addressed.

E - The employee, while not intending to cause harm and not engaging in behaviour that represented an unjustified risk, made an error or mistake that they have a history of. Although the organisation has addressed this, the employee is believed to possess the capability to perform the role.

F - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, made an error or mistake that they have a history of. The organisation has addressed this and the employee is now believed to lack the capability to perform the role.

G - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, engaged in at-risk behaviour. The systems in place were inappropriate for the scenario and the employee may have a history of system induced at-risk behaviour.

H - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, engaged in at-risk behaviour that they have no history of.

I - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, engaged in at-risk behaviour that they have a history of but that the organisation has not addressed.

J - The employee, while not intending to cause harm and not engaging in behaviour that represented an unjustified risk, engaged in at-risk behaviour that they have a history of. Although the organisation has addressed this, the employee is believed to possess the capability to perform the role.

K - The employee, while not intending to cause harm and not engaging in behaviour or action that resulted in an unjustified increase in risk, engaged in at-risk behaviour that they have a history of. The organisation has addressed this and the employee is now believed to lack the capability to perform the role.

L - The employee did not intend to cause harm and could not have been expected to recognise that the behaviour or action resulted in an unjustified increase in risk, due to the systems in place being inappropriate for the scenario.

M - The employee did not intend to cause harm and could not have been expected to recognise that the behaviour or action resulted in an unjustified increase in risk.

N - The employee did not intend to cause harm, but should have recognised that the behaviour or action resulted in an unjustified increase in risk. The systems in place were inappropriate for the scenario and the employee may have a history of system induced errors, mistakes or at-risk behaviour.

O - The employee did not intend to cause harm, but should have recognised that the behaviour or action resulted in an unjustified increase in risk. The employee has no history of this type of behaviour.

P - The employee did not intend to cause harm, but should have recognised that the behaviour represented an unjustified risk. The employee has a history of this type of behaviour that the organisation has not addressed.

Q - The employee did not intend to cause harm, but should have recognised that the behaviour or action resulted in an unjustified increase in risk. The employee has a history of this type of behaviour that the organisation has addressed, however is believed to possess the capability to perform the role.

R - The employee did not intend to cause harm, but should have recognised that the behaviour or action resulted in an unjustified increase in risk. The employee has a history of this type of behaviour that the organisation has addressed and is now believed to lack the capability to perform the role.

S - The employee did not intend harm, but consciously disregarded an increase in risk they knew to be unjustified

T - The employee intended to cause harm