

# IMPLEMENTING JUST CULTURE IN PRACTICE THE 'JC 11' METHODOLOGY

Implementing Just Culture is a complex undertaking, requiring safety-critical organisations to go beyond principles. In this article, **Maria Kovacova** shares her experiences as a safety manager in an air navigation service provider, introducing the 'JC 11' methodology: a practical approach to evaluating and implementing Just Culture.



For any aviation organisation, the idea of Just Culture is one thing, but implementation is another. In my former organisation (an air navigation service provider) in the mid-2000s, our internal procedures already incorporated some Just Culture (JC) principles. These were primarily based on ICAO standards, which mainly focused on the investigation process itself. However, we recognised the need to delve deeper into the core principles of Just Culture and how gathering more information could enhance our managerial systems, training programmes, procedure development, and other systems that contribute to the safe and efficient provision of air navigation services.

## Organisational Changes and Challenges

Like any ANSP, our organisation experienced changes in both legislation and management. A common challenge in the aviation industry is when new management members lack awareness of safety topics. It is not uncommon to find a new CEO requesting a thirty-minute briefing on Just Culture, which seems like a joke until you realise that it's not. These situations underscore the importance of effective communication and the educational role of the safety managers. They also highlight the importance of leadership and education about topics that are critical to safety.

In parallel with legislative discussions on Just Culture, and the issue of protecting those reporting incidents, the emergence of social media brought a new dimension to aviation occurrence reporting. Even less serious incidents started drawing interest from the judiciary system. Consequently, establishing effective communication channels between the aviation and judiciary worlds became necessary. But this presented us with additional challenges.

## The JC 11 Methodology: A Comprehensive Approach

As a safety manager, I focused on the internal implementation of Just Culture within our organisation. I found that numerous books addressed the concept and principles of Just Culture. There was even some practical guidance on what kind of language to use, how to protect the reporter, and which information should be available to representatives of justice. But there was a lack of practical guidance to evaluate our existing approach.

To bridge this gap, a questionnaire on Just Culture maturity was developed in collaboration with EUROCONTROL. This questionnaire provided a framework for understanding the key principles of Just Culture, its role in safety culture, and its integration into the safety management system. These insights eventually led to the development of the 11-step JC implementation process.

### **Step 1. Establishment of the Just Culture working group**

**(JCWG):** Top management creates a dedicated team of experts responsible for implementing, maintaining and improving Just Culture principles within the organisation. This group has to have a positive and proactive approach to JC, occurrence reporting and safety culture.

**Step 2. Training for the Just Culture working group:** This involves providing the JCWG with adequate education and training to ensure their credibility within the organisation.

### **Step 3. Presentation of Just Culture within the organisation:**

Presentations or workshops are conducted to introduce the JC concept, its core principles, and its implications for the organisation.

**Step 4. Preparation of Just Culture policy:** A Just Culture Policy is drafted collaboratively, involving the JCWG, employee representatives, union representatives, and management representatives. This shows to all employees the commitment of the management to establish a positive JC environment, and gives employees the opportunity to participate and build mutual trust.

**Step 5. Endorsement of Just Culture policy:** The Just Culture Policy is approved by the CEO, with endorsement by employees and members of management. The policy is disseminated throughout the organisation.

**Step 6. First Just Culture survey/assessment:** An internal survey or assessment is conducted to evaluate the current state

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of Just Culture within the organisation (including the current reporting system, and protection of safety data).

**Step 7. Recommendations for implementation and improvement:** A report is prepared on the organisation's current JC status, defining actions, responsible personnel, and expected deadlines for JC implementation or improvement. The action plan is presented and discussed with unions and employee representatives.

### **Step 8. Regular update of the internal reporting system:**

Regular updates and modifications are made to the occurrence reporting system, along with ongoing analysis and periodic (e.g., annual) engagement with national aviation investigation boards, civil aviation authorities, and prosecutor offices.

### **Step 9. Establishment/definition of the internal procedure for individual behaviour assessment:**

**for individual behaviour assessment:** A procedure is defined to help assess individual behaviour, distinguishing between acceptable and unacceptable actions in the case of occurrences.

### **Step 10. Organisation of internal Just Culture workshops**

**– Just Culture elements and procedures:** Workshops are conducted on Just Culture elements and procedures, helping employees to understand that honest mistakes will not be met with sanctions, while negligence remains intolerable.

### **Step 11. Continuous measurement and improvement:**

Another JC assessment is performed one year after formal implementation, defining findings, and presenting the annual action plan during management safety board meetings to secure resources for important JC activities.

## Conclusion

Changing an organisation's culture is a challenging task that takes time. However, by actively working to modify or influence practices, rules, and relationships within the organisation, stakeholders can contribute to the emergence of a Just Culture. The 'JC 11' methodology provides a practical approach to implementing the necessary resources and procedures, and can be used by other organisations to foster a positive Just Culture environment and a commitment to safety in all aspects of operations. S



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