SCAA JUST CULTURE POLICY

A GUIDE TO SCAA's POSITION & PRINCIPLES

Purpose of this guide

The purpose of this guide is to help clarify SCAA Just Culture principles and make sure we conduct our business in a manner which is consistent with the SCAA Safety policy

Preface

Welcome to this guide, which focuses on SCAA's Just Culture

A Just Culture is a key, if not the key component of a strong Safety Culture. It is defined by the set of beliefs and values we hold and how we behave and demonstrate our commitment to safety. It affects us all, from myself as CEO to the operational employees at the units.

A strong Safety Culture is built on the application of a Just Culture where open and honest reporting is supported and acknowledged. As SCAA staff, you are key to our Safety Culture and you are best placed to highlight potential risks and offer solutions. It is therefore our joint responsibility to safeguard each other and ourselves by being proactive thus reducing our risk of serious incident or accident.

I hope this guide further develops and strengthens our Safety Culture and gets you thinking about how we continue to improve. You have my full support and commitment to work with you to further improve our environment of learning and constant safety improvement.

Gilbert Faure
CEO SCAA

SCAA Just Culture Policy Statement

A culture where staff are not punished for actions, omissions, or decision taken by them that are commensurate with their experience and training but where gross negligence, wilful violations and destructive acts are not tolerated.

SCAA is committed to operate according to highest safety standards.

To achieve this goal, it is imperative to have uninhibited reporting of all accidents, incidents, events, hazards, risks and other information that may compromise the safe conduct of our operations.

To this end, all SCAA employees are responsible for, reporting any safety-related information.

1. Reporting is free of any form of reprisal. The main purpose of reporting is for risk control and accident and incident prevention, not the attribution of blame.

2. No action will be taken against any staff member who discloses a safety concern/information through the

reporting system, unless such disclosure reveals, beyond any reasonable doubt, an illegal act, gross negligence, a deliberate or wilful disregard of regulations or procedures.

3. Our method for collecting, recording and disseminating safety information guarantees the protection to the extent permissible by law, of the identity of those who report safety information. The identity of any person making a report will not be disclosed unless required by law.

4. SCAA will provide employees full support during any external investigation by the police or judicial authorities following an Aviation related incident or accident.

Having a Just Culture therefore benefits the whole Organisation.

SCAA wins because a Just Culture provides us with a level of confidence about what our real risks are because employees themselves are telling us what they are. We respect the concerns of those reporting and are prepared to receive bad news.

As employee you win because you can have confidence that you can report safety concerns without fear of

retribution – even if those safety concerns will highlight mistakes or misjudgments that you have made.

In the end, we all benefit because there is greater clarity about where the line is between genuine error and negligent or reckless actions, i.e. between acceptable and unacceptable behaviour.

Safety is one of our "Core" business functions and we should all contribute towards its management and therefore keeping our operational risks at an acceptable level at all times.

Reporting of safety issues is the best way you can contribute towards this objective. A Just Culture is therefore the best way to achieving a truly open reporting culture and is an extension towards our commitment to our safety policy.

Wilfred Fock Tave
Accountable Executive (Safety)

The SCAA Principles

In order to ensure that a Just Culture exists within SCAA, we adhere to a set of Just Culture Principles. These are:

Just Culture leads to Open Reporting

A Just Culture is the keystone to creating the kind of organisational Safety Culture that we all wish to see. We believe in an environment where employees can raise their hands when they have identified a risk or made a mistake.

Our Just Culture encourages reporting and puts a high value on open communication.

Risks are openly and honestly discussed

We want to ensure that everyone takes responsibility for creating an environment of trust where incidents, errors, and risks are openly and honestly discussed between managers and employees leading to a culture where SCAA employees are hungry for safety knowledge.

Everyone should have confidence that they can report safety concerns without fear of retribution – even if those safety concerns will highlight mistakes or misjudgments that they have made.

Our Just Culture specifically applies to the aviation operational safety domain and the delivery of a safe service.

However other SCAA policies may be reviewed as appropriate to reflect the Just Culture policy where justified.

Whether you are an Air Traffic Controller, an Engineer, an Airside Operations Officer, a fire fighter, a maintenance staff working on the airside or any employee involve with operations' safety, individual accountability means that, in carrying out your duties, you are responsible for your actions and answerable for their consequences.

In practice, in our Just Culture, this means that where an individual makes a mistake, the consequences of that mistake will not involve punitive action. If an individual makes a mistake, it is quite possible that anyone could make it. Therefore, disciplining that individual would not prevent the same mistake from happening to anyone else, whilst encouraging the person to report the mistake will contribute to the prevention of a serious incident or an accident

In contrast, if an individual deliberately deviates from standard procedures, for example: An employee proceed onto the Runway without seeking prior permission from Air Traffic Control, it may be appropriate to take disciplinary action. This is true regardless of whether or not a safety incident has occurred as a result of the individual's actions. However, the full context of the situation needs to be known before that decision can be made. The questions that

we would ask in such circumstances would include (but wouldn't be limited to):

- **Was the individual fully aware of the procedure?**

- **Is this a common practice by the individual concerned or was it a one-off?**

- **Is it only this person who would act in this way or is it common practice in their team?**

- **If it was common practice, did peers, supervisors, managers, etc. know about it but not challenge it?**

Just Culture applies to the behaviours and actions of employees that affect the delivery of a safe operational service. It does not apply to non-operational matters. If, for example, a controller has allowed their medical to lapse, this does not fall within the scope of a Just Culture.

Similarly, if an employee acts in a manner which is deemed as unacceptable by colleagues or supervisors, for example, using offensive language to colleagues, this is not something which Just Culture concerns itself with.

In such cases, the individuals concerned may be dealt with either through the appropriate disciplinary procedures, as detailed in the Employee Handbook or appropriate SCAA policy.

Situations which do not involve the behaviours of employees not directly involved in the delivery of aviation safety do not fall within the sphere of our Just Culture.

Just Culture is about balancing safety and accountability

Just Culture means openly reporting and discussing safety issues and mistakes, while accepting that we must be individually held to account for our actions. Individual accountability should not be confused with the SCAA Safety Accountabilities which are held by GMs and some Managers in SCAA, signed by them, and published in the Safety Management Manual. SCAA Safety Accountabilities make individual senior managers formally accountable.

On the other hand, individual accountability in SCAA, as in any area of life, is not something that you sign up to. Rather, it is something that you hold de facto – in this case it happens to relate to the jobs that we do. **Regardless of your role in SCAA, you are accountable for your actions.**

Just Culture is about learning safety lessons

In order for employees to feel confident to report (without jeopardy) safety issues which may implicate them, everyone must accept that people make errors and employees will not be punished simply for making an error.

Our aim is to find out what went wrong, why it happened, and to act to prevent it happening again. If one person makes a mistake, the same thing could almost certainly happen to anyone else. Our aim is to stop that happening by learning the lessons from the first error before it leads to something more serious. In that way, we can all help to protect each other.

A Just Culture is not a 'No Blame' Culture.

There is a line between acceptable and unacceptable safety behaviours

◊ We accept people are fallible and do not punish them simply because they have made an error. However, we need to differentiate between error and action which could be regarded as reckless or deliberate.

◊ We do not support employees who wilfully or repeatedly make decisions, or show behaviours, that knowingly present a substantial and unjustifiable risk – a risk that most colleagues would recognise as being likely to lead to a poor outcome.

Situations are not condoned where individuals act outside appropriate rules and procedures or behave in a manner which may endanger themselves or others.

The failure to take action if employees act in a reckless or negligent way may create a risk to the safety of our operation and weaken the foundations of our Safety Culture.

Therefore, reckless or negligent behaviour may warrant disciplinary action, within existing SCAA policies, dependent upon the context.

For example, rule- breaking may occur as a result of a one-off individual decision, or peer group common practice, or because an individual broke a rule with the best of intentions. Any disciplinary action will be determined based

upon such factors.

◊ It is worth reminding ourselves that, in the event of an incident, actions such as withdrawal from duty may be taken for the benefit of the individual concerned and this is also true when a pattern of repeated errors are observed which may require further Unit Competency checks (Those are non-punitive measures). A Just Culture should allow employees to talk about such actions in terms which mean they are not seen as 'punishments'.

## Acceptable and unacceptable Behaviours - Where do we draw the line?

Research in aviation and other industries, confirms that there is no single, fixed line that can be drawn to determine whether an individual's actions or behaviours are acceptable or unacceptable. Some behaviours always fall self-evidently on one side of the line or the other. For example, turning up for duty under the influence of drugs or alcohol is clearly unacceptable under our Drug and Alcohol Policy and there should be no debate about Just Culture in such cases. At the other end of the spectrum, if a controller coordinates the wrong flight level to an adjacent control unit and an incident results, this is a simple error which could happen to anyone. In that case, Just Culture states that we wouldn't take any punitive action but would seek to find out why the individual coordinated the wrong flight level, support them in reducing the likelihood of recurrence, and derive lesson to be learned for the rest of the operation.

However, the line is sometimes not as clear as the one between the two cases described. For example, if someone misreads information on a display because they are distracted through reading a newspaper, is that OK? If they missed an incorrect read-back because they were answering a phone call is that acceptable? Does it make a difference whether the phone call was an operational call or a personal one? Why?

It soon becomes apparent that deciding where the line is, i.e. whether someone's actions are acceptable or not, is entirely dependent upon the context of the situation.

Figure 1 on the next page illustrates the fact that context makes the line moveable within certain bounds.

A Just Culture helps us to focus on where the line is in any given case and whether that line has been crossed or not. If it has not, punitive action is inappropriate: if it has been crossed, the disciplinary process may be called on.

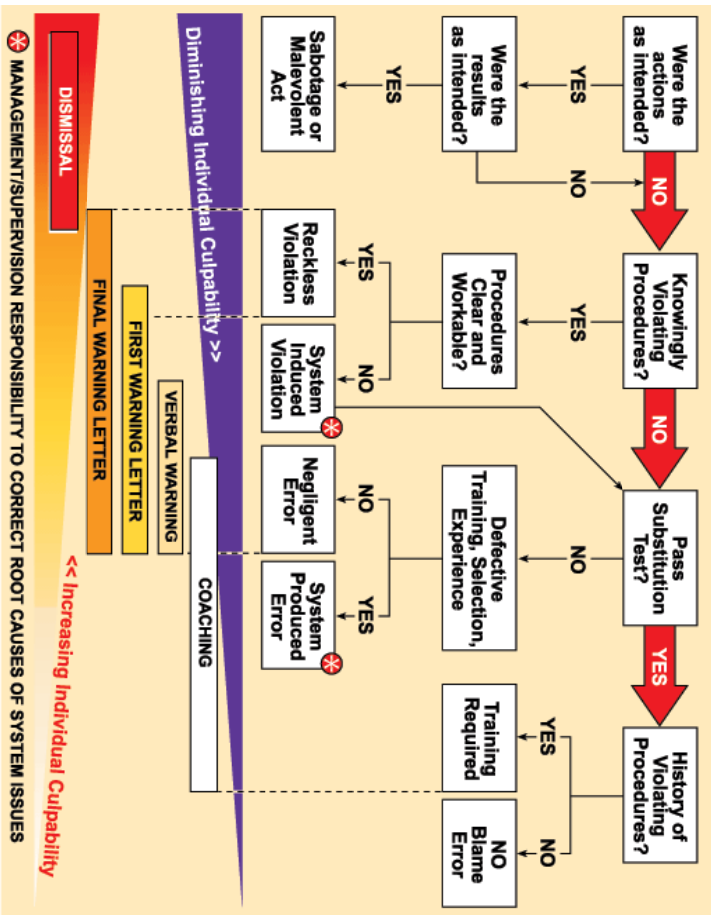Acceptable   Decision   Unacceptable
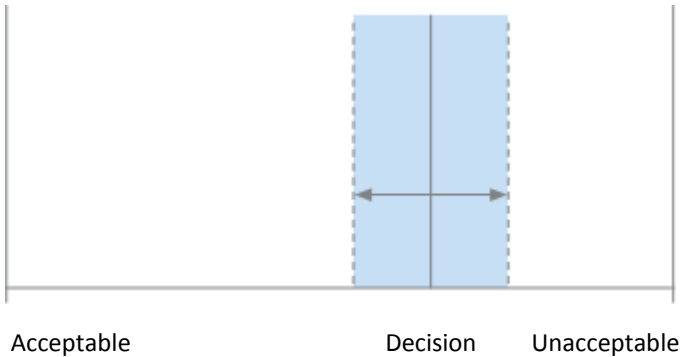
(Figure 1)

This illustrates the point that getting Just Culture right depends upon expert knowledge of the situation.

It would be entirely inappropriate for SCAA to publish a list of items which are considered 'acceptable' or otherwise.

Instead, we need to ensure that the decision on 'drawing the line' is made by the right people. The right people are those with the expertise to understand the full context of the event. They are the ones who are able to assess whether the event was the result of a genuine mistake or misjudgment that anyone with similar training and experience could have made. They are also able to judge whether the actions of the individual concerned crossed the line. SCAA adopted the decision tree **(Figure 2)** to guide decision making as to whether ones' action was acceptable or not.

(Figure 2) Decision Tree

Where the line gets drawn is determined by those in the operation

Whether an individual's actions were acceptable, normal practice must be determined by a panel from within the operation, i.e. similarly qualified colleagues, supervisors, unit/section Safety coordinator, Safety Manager and when deemed appropriate by the Accountable Executive technical support may be sought from field experts from within or outside SCAA. Where it is determined that the actions were normal practice, it may be inappropriate to punish an individual. However, if that normal practice was unacceptably risky, e.g. as the result of watch non-conformance which had grown unchallenged over time, it may be necessary to question the role played by local supervisors, training unit etc.

The report and recommendation shall be submitted to the General Manager of the Division (s) concerned, who may challenge the decision of the panel through the Accountable Executive for Safety.

If someone reports an event which may implicate themselves we will treat them justly.

When an individual has reported an event or safety concern that may implicate themselves, this should be taken into account when determining what, if any, action (including disciplinary) is required. Investigations and reports should be conducted in an objective, non-judgmental manner. Investigators should be – and be seen as – independent.

Reporters should be kept informed of investigation progress.

The outcome of reports should be made openly available along with lessons learned, and the rationale for any disciplinary action. The nature of the disciplinary action itself should not necessarily be publicised. Reporters should be painted in a positive light for their contribution to safety learning.

SCAA ISMS supports the Just Culture Policy

SCAA's Just Culture acknowledges that all staff, as humans, commit errors. We are, therefore, supportive of individuals who make honest mistakes and recognise that disciplining on that basis is counter-productive. However, situations are not condoned where individuals act outside appropriate rules and procedures or behave in a manner which may endanger themselves or others. In order for our Just Culture to be effective, we must all be clear where the line is between acceptable and unacceptable behaviour in the course of the delivery of a safe operational service.

The SCAA Integrated Safety Management System (ISMS) is only as effective as the people who deliver it. The rigour with which we report safety concerns depend upon our Safety Culture and good application of the safety Culture.

 I therefore encourage managers and supervisors to promote the understanding of the SCAA Just Culture policy, thereby making sure it forms the solid foundations of our Safety Culture.

Kisnan Tamatave

Aviation Safety Manager

Further details

If you have any comments or questions about any of the material in this guide, you can address your query to:

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