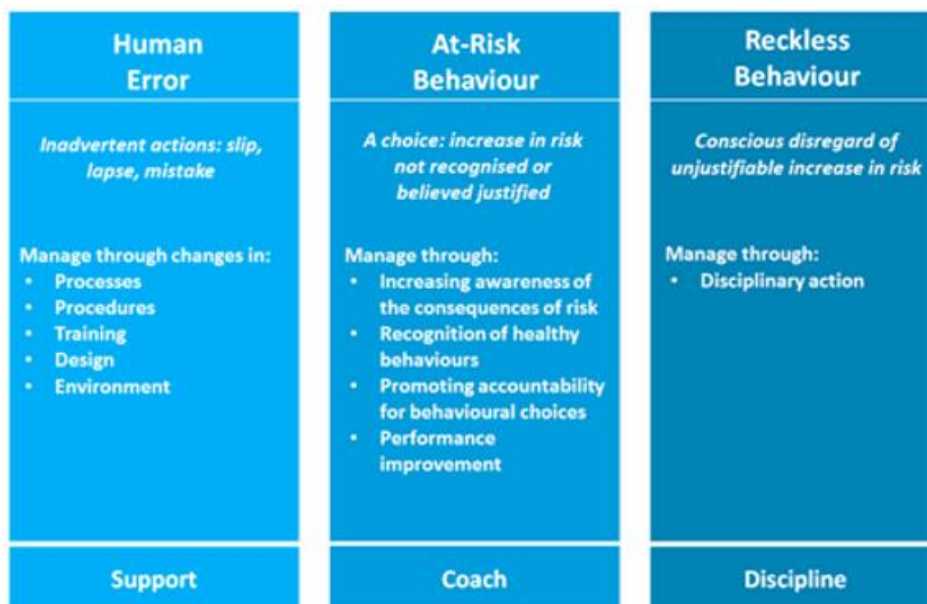


SMS Good Practice Submission			
State whether this is a Best or Good Practice:			
ANSP	Airservices	Date of submission	July 2024
SoE Study Area	SA1.3 Safety Culture		
BP/GP title	Our Just Culture		
In use since	2018		
ANSPs using this practice (for BP specifically)	In 2022 it was assessed that NAV Canda and Industry more broadly have largely caught up with this practice.		
Key Words			

**Context:** Airservices has had a Just Culture Policy in place for over a decade, however our SMS in that time has lacked sufficient supporting artefacts to support its communication, understanding and application.

Airservices has adopted the three tiered Just Culture approach in responding to and managing behaviour (Figure 1), based on the Outcome Engenuity model and has put in place several supporting tools to enable its application.



**Figure 1 – Airservices Just Culture Model**

**Scope of Just Culture:** In looking to put in place additional components supporting Airservices' Just Culture Policy, Airservices has adopted the position that Just Culture principles apply to all functions we perform, both operational and non-operational and whether safety related or otherwise.

**Our Just Culture Program:** To enable this balanced approach, a cross-functional and cross-organisational team (a safety system specialist, two people and leadership specialists and a communications specialist) led the design and implementation of the 'Our Just Culture' program throughout 2018-19. The aim of the program was to establish the system components and also promote the principles and organisational commitment.

Learning from the failures of previous "theory-heavy" attempts, our strategy focussed more on engagement and 'getting the conversation started'. Including:

- Executive promotional videos, produced in a tongue-in-cheek manner, in order to show leadership commitment while also highlighting key principles
- Just Culture coasters (Appendix A) provided the ability to introduce printed material into the operational areas, which we had been unable to achieve with previous attempts (booklets, brochures, etc.).
- A leader-led activity for a Just Culture conversation within individual teams was developed and supporting material provided to all leaders, including a presentation, facilitator guide and quick reference card for staff including the principles, approach and some tangible everyday actions (Appendix A).

**Current state**

We have now fully integrated the principles of Just Culture within the Airservices Code of Conduct. The revised Code of Conduct Standard explicitly references the application of these principles within code of conduct related investigations and also references the need to work to improve the resilience and robustness of our systems and systems and processes.

The executive videos have now been embedded within our Corporate Induction program, which is delivered to all new staff upon commencement.

We have a training regime in place for all staff with responsibilities for conducting or accepting the outcomes of investigations into occurrences related to safety (operational and workplace), security, environment, ethics and fraud, and code of conduct. The training focusses on a more in-depth understanding of the Just Culture principles, including application to a number of detailed case studies and introduces the use of the Just Culture Decision Support Tool (discussed further below) as a mechanism to drive and document repeatable consistent results when making decisions regarding Just Culture related matters.

In order to provide consistency in investigation outcomes with respect to our Just Culture principles, we have a Just Culture Decision Support Tool (Appendix B). In the event of a deviation from expectations or service levels (e.g. an incident) the tool is designed to 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<sup>1</sup> action that is consistent with Airservices Just Culture Model.

The combination of these elements facilitate the application of our organisational Just Culture principles in domains other than just safety.

**By submitting this document, your organisation is willing for the proposed Best or Good Practice to be shared with other ANSPs.**

For Best Practices, this document should be sent together with the SoE in SMS questionnaire, to: [soe\\_2024@eurocontrol.int](mailto:soe_2024@eurocontrol.int) **by 30<sup>th</sup> June 2024 at the latest.**

Submissions for consideration as Good Practices may be sent by the above date. They may also be identified during the survey interview sessions with the assessment team, following which a Good Practice submission document will be requested.

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<sup>1</sup> The indicated action is a guide and must only be considered based on the individual situation's context and circumstances

OUR JUST CULTURE




**HUMAN ERROR**  
We support the individual and strengthen the system



**AT-RISK BEHAVIOUR**  
We coach the individual to better appreciate risk



**RECKLESS BEHAVIOUR**  
We apply appropriate and proportionate disciplinary action

OUR VALUES




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

Just Culture Coasters  
(Front and Back)

OUR JUST CULTURE


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, in accordance with our Code of Conduct.

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 take accountability for 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

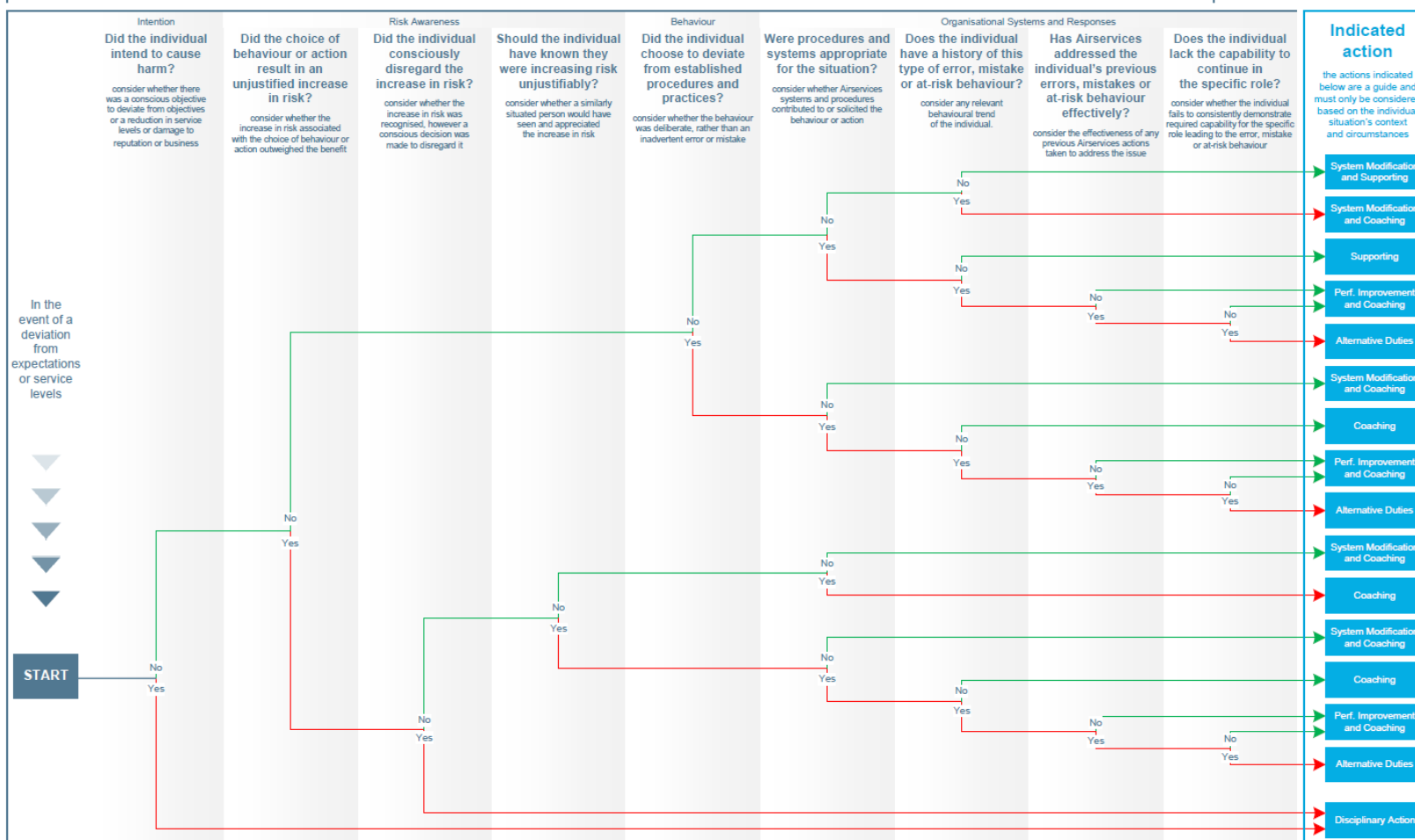
A Just Culture supports our values, enables shared understanding of expectations and facilitates trust

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

Quick Reference Guide

## Airservices Just Culture Decision Support Tool

Version 1: Effective [DATE]



**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.

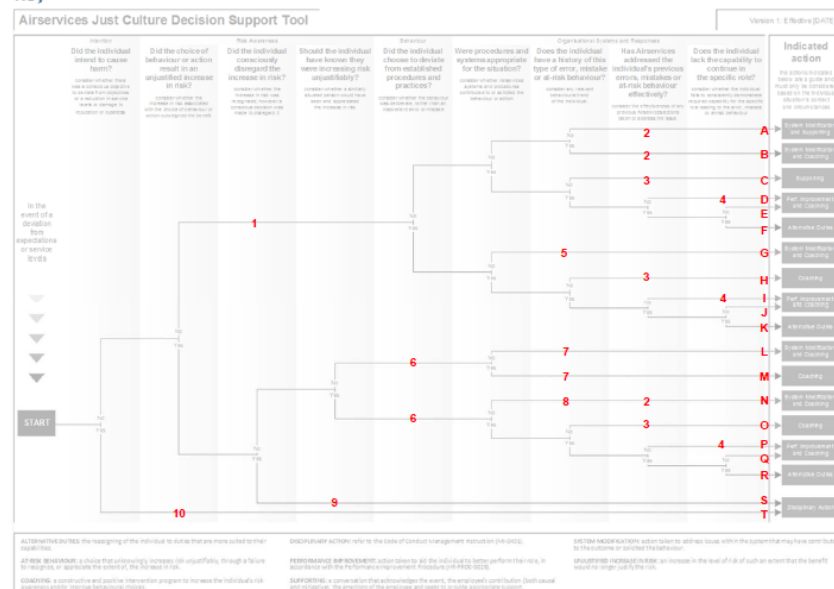
**SYSTEM MODIFICATION:** action taken to address issues within the system that may have contributed to the outcome or solicited the behaviour.

**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 Airls/Services Just Culture Decision Support Tool is to assist managers' decision making in the event of an adverse outcome for Airls/Services 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 Airls/Services 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