



**"Safety culture"** the most precious element in aviation, we paid lives to get what we have today, it is our duty to make sure, safety will be practice every day, losing this culture is like losing priceless diamond.

*Pilot. Seyed Alireza Amintabar*

Safety Culture is the way safety is perceived, valued and prioritized in an organization. It reflects the real commitment to safety at all levels in the organization. It has also been described as "how an organization behaves when no one is watching".

Safety Culture is not something you get or buy; it is something an organization acquires as a product of the combined effects of organizational culture, Professional Culture and, often, National Culture. Safety Culture can therefore be positive, negative or neutral. Its essence is in what people believe about the importance of safety, including what they think that their peers, superiors and leaders really believe about safety as a priority.

Why is Safety Culture Important?

Safety Culture can have a direct impact on safe performance. If someone believes that safety is not really important, even temporarily, then workarounds, cutting corners, or making unsafe decisions or judgments will be the result, especially when there is a small perceived risk rather than an obvious danger. However, a typical and understandable first response to Safety Culture is: **"We already have an SMS, why do we need Safety Culture too?"**

A Safety Management System represents an organization's competence in the area of safety, and it is important to have an SMS and competent safety staff to execute it. But such rules and processes may not always be followed, particularly if people in the organization believe that, for example, 'moving traffic' is the real over-riding priority, even if risks are occasionally taken. Where would people get such an idea? The answer, ultimately is from their peers, but more so their superiors, including the person at the helm of an organization, namely the CEO. To ensure the required commitment to safety, organizational leaders must show that safety is their priority.

So, organizations need both a SMS and a healthy Safety Culture in order to achieve acceptable safety performance. But with aviation, there is the problem that it is generally very safe, with serious accident outcomes occurring only rarely. This means that almost all organizations will assume they are already safe. There may be few incident reports, and these may be of low severity; safety cases may be well in hand for current operations and future changes. Real aircraft accidents are usually complex and multiple causes can be identified, so it is not always easy to see them coming. Even harder to see are contributing situations which affect an organization's 'forward vision' in safety. For example, under-reporting of incidents due to fears of recrimination or prosecution; people running risks because they believe that is what they are supposed to do; different sub-groups not sharing information due to a lack of mutual trust; etc.

**If you want to remain safe, you have to know the realities of safety in your organization**

How could a CEO be sure if such undermining factors were evident in their organization? By asking their directors? By touring the workforce and asking? The alternative, and more robust approach, is to carry out a Safety Culture survey which attempts to 'measure' Safety Culture in a way which can be repeated subsequently for comparative purposes.

How do You Measure Safety Culture?

Safety Culture, like culture, is sometimes hard to see from the inside. It is like a fish swimming in water - the fish does not really think too much about the water. Therefore, Safety Culture surveys, in most industries, are usually a combination of internal and external perspectives: the 'outsider's view is used to help make objective the insider's viewpoint. That being said, however, it is useful to have a 'champion' inside the organization who can act as an interface between the survey findings and the staff at all levels. This champion is typically the Safety Director or Safety Manager of the organization.

A typical Safety Culture Survey might proceed as shown below:



### Safety Culture Survey

It is a tried and tested process starting with 'prelaunch' discussions to explain the process, decide the breadth and copy of the survey, and to reassure the Air Navigation Service Provider that the approach is:

1. Anonymous
2. Confidential to the organization
3. Independent – not favouring any particular group

The survey process must lead to clear and concise actions being developed by the organization to address any deficiencies identified. These may related to either particular employee functional groups or to specific business or operational processes.

The overall timings of the approach are illustrated below:



## Safety culture survey timings

A typical of Safety Culture includes the components illustrated below:



## Safety Culture components

### What Does Safety Culture Deliver

An optimum Safety Culture will deliver a clearer and more comprehensive picture of operational risk, one that takes in all aspects of the activities of the organization. This is possible through the achievement of a better information flow and the maintenance of an effective dialogue within the organization about safety performance as priority.

### Why Safety Culture Awareness matters

As well as the 'macro' effects already described, a focus on knowing what the level of safety culture is and striving to achieve a level which is adequate brings a better focus on incident recording, incident analysis, staff training and the integration of maintenance safety and operational safety priorities.

Safety Culture must be seen as a key business target so that the people at the 'sharp end' feel empowered to act in the interests of safety in the knowledge that the management will support them. This enhancement of mutual trust is invariably accompanied by a positive impact on productivity.

Any doubts about the validity of a Safety Culture Survey as a means to benchmark Organization culture can be resolved, if resources allow, by carrying out two independent surveys in parallel, which in the past has produced comparable results from both surveys.

Each organization is different and each will also have its own national culture as a business environment, so the both the methods and the opportunities for achieving organizational safety culture will vary. However, the insight achieved by regular measurement of safety culture and the use of the results to identify where improvement effort must be targeted is essential.

### What Does Safety Culture Measurement Cost?

In all but very large organizations, it will often be necessary to pay for a specialist outside agency to design and undertake a survey. For Air navigation service providers in Europe, support from EUROCONTROL may be available and EUROCONTROL has built a web-based Safety culture toolbox which will help access potential survey resources. Alternatively, it may also be possible to achieve a full survey by engaging with academic institutions which are interested in the concept of business culture measurement.

In addition to this, there will be an internal cost in staff time for employees to participate in a survey and for a 'champion' to campaign for participation. There may also be an administrative cost of organizing survey participation. Completion of each individual questionnaire might take 20-30 minutes and group meetings or workshops might be needed, especially for a first-time survey. Implementation of safety improvements indicated by the findings of the survey is also an internal cost. However, most of this resource requirement is not onerous and much of it can be carefully timed to minimize real extra cost.

## Just Culture?!

One key to the successful implementation of safety regulation is to attain a “just culture” reporting environment within aviation organizations, regulators and investigation authorities. This effective reporting culture depends on how those organizations handle blame and punishment.

Only a very small proportion of human actions that are unsafe are deliberate (e.g. criminal activity, substance abuse, use of controlled substances, reckless noncompliance, sabotage, etc.) and as such deserve sanctions of appropriate severity. A blanket amnesty on all unsafe acts would lack credibility in the eyes of employees and could be seen to oppose natural justice. A “no-blame” culture per se is therefore neither feasible nor desirable.

What is needed is a “just culture”, an atmosphere of trust in which people are encouraged, even rewarded, for providing essential safety-related information - but in which they are also clear about where the line must be drawn between acceptable and unacceptable behavior.

There is a need to learn from accidents and incidents through safety investigation so as to take appropriate action to prevent the repetition of such events. In addition, it is important that even apparently minor occurrences are investigated, in order to prevent catalysts for major accidents. Safety analysis and investigation is a necessary and effective means of improving safety, by learning the appropriate lessons from safety occurrences and adopting preventative actions. It is therefore important that an environment exists where occurrences are reported; the necessary processes are in place for investigation and for the development of necessary preventative actions such as re-training, improved supervision etc.

### Conditions for Just Culture

Under “Just Culture” conditions, individuals are not blamed for ‘honest errors’, but are held accountable for willful violations and gross negligence.

People are less willing to inform the organization about their own errors and other safety problems or hazards if they are afraid of being punished or prosecuted. Such lack of trust of employees prevents the management from being properly informed of the actual risks. Managers are then unable to make the right decisions in order to improve safety. However, a totally “no-blame” culture is neither feasible nor desirable. Most people desire some level of accountability when a mishap occurs.

In an attempt to solve that problem, J. Reason described a “Just Culture” as an atmosphere of trust in which people are encouraged, and even rewarded, for providing essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behavior.

Hence, a Just Culture supports learning from unsafe acts in order to improve the level of safety awareness through the improved recognition of safety situations and helps to develop conscious articulation and sharing of safety information. Consequently, a Just Culture can be regarded as an enabler, and even indicator of, (a good) Safety culture.

### Statement Outlining Just Culture

People are understandably reluctant to report their mistakes to the organization that employs them or the government department that regulates them. To encourage them to do so, these organizations should publish statements summarizing the fundamental principles of a just culture which they will follow. Additionally, they must ensure that these principles are applied at all levels of their organizations.

Such a statement should cover the following matters:

#### **Confidentiality**

People are reluctant to draw attention to errors made by themselves or their colleagues, due to personal embarrassment. They must be confident that their identity, or the identity of any person implicated in the report will not be disclosed without their permission or unless this is required by law. An assurance should also be given that any subsequent safety action taken will, as far as possible, ensure the anonymity of the persons involved.

#### **Punitive Action**

A person who breaks the law or breaches a regulation or company procedure through a deliberate act or gross negligence cannot expect immunity from prosecution. However, if the offence was unpremeditated and unintentional, and would not have come to light except for the report, he/she should be protected from punishment or prosecution.

### **Loss of License**

The circumstances of a report may indicate that the performance of an individual is below the acceptable level. This may indicate the need for further training, or even cancellation of an individual's license. Such action must never be punitive.

An example of a statement made by a regulator is contained in the introduction to **UK CAA CAP 382: Mandatory Occurrence Reporting**.

### Key Features for Developing and Maintaining a Just Culture

The following list outlines some of the key features that need to be addressed when developing and maintaining a Just Culture in an organization:

- Just Culture policy documented.
- Definitions agreed about what is “acceptable” behavior, and what is “not acceptable”. (Note: these will be specific to, and aligned with, values derived from national, organizational and professional cultures).
- Sanctions agreed for unacceptable behavior.
- Process to deal with actions in the “grey area”.
- Just Culture policy communicated throughout the organization.
- Reporting systems linked to Just Culture policy.
- Fair treatment being applied.
- Breaches of the policy being monitored (e.g., error punished or violations excused).
- Reports being followed-up; actions taken to address error-producing conditions.