

Wellington Aero Club (incorporated)

Just Culture

Safety Management System

*A Safety Management System (SMS) is a systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies and procedures.*¹

1. The first object of the Wellington Aero Club (WAC) is to promote, foster, encourage and develop safe and skilful flying and the practice, study, and research of aviation in all its aspects.² Fundamental to safe flying practices is having a system that manages risks and implements safety policy and practices. The WAC has developed and based its Just Culture SMS on the guidelines issued by the Civil Aviation Authority (CAA) of New Zealand in its Safety Management AC100-1.
2. The CAA consider that a SMS is designed to:
 - a. manage risks within the organisation, with a particular focus on risks which impact safety;
 - b. provide for ongoing monitoring and assessment of safety performance;
 - c. make continuous improvements to the level of safety in operations; and
 - d. develop and improve the safety culture within the organisation.
3. CAA consider a SMS should be woven into the fabric of an organisation, so that it becomes part of the culture, the way people do their jobs. The concept of developing a 'positive safety culture' is an important overall goal in any organisation.
4. The Safety culture that the WAC has adopted is a 'Just Culture'. A just culture "is about applying a fair and measured approach to flight safety. It is a concept based on the key tenets of a successful flight safety culture – open and honest reporting; fair and robust investigation; and accountability from all levels of the organisation."³

¹ Civil Aviation Authority (CAA) of New Zealand, Safety Management, Advisory Circular AC100-1 Revision 0, 7 May 2015, Civil Aviation Authority (CAA) of New Zealand, Wellington, p.4..

² Wellington Aero Club (Incorporated), *Wellington Constitution and Rules*, 22 July 2010, Wellington Aero Club (Incorporated), Wellington, p.2.

³ Air Chief Marshall Sir Jock Stirrup (Rtd) GCB AFC ADC FRAES FCMI RAE - Former Chief of Defence Staff - Royal Air Force, *Giving Weight to a 'Just' Culture In Aviation*, INSIGHT Summer 2015, Royal New Zealand Air Force Directorate of Air Force Safety and Health (DASH), Wellington, p.1.

Just Culture

5. Open and honest reporting of incidents and hazards allows us to learn from our mistakes both individually and organisationally.

6. **The Need for a Just Culture.** In the aftermath of any kind of unwanted safety-related event in any organisation, a tension may be created between the requirements of safety and discipline, and the need to avoid any suggestion that the organisation is simply protecting itself by placing responsibility on individuals. Safety requires finding out what happened to prevent recurrence, while the disciplinary requirement must ensure that, where Flight Orders or regulations have been deviated from without cause or need, or people have failed to meet required standards, appropriate sanctions are brought to bear. A carefully defined and widely understood Just Culture will provide a standardised environment within which the requirements of honesty, appropriate behaviour and the desire for flight safety can be incorporated with the application of appropriate discipline and accountability. This will also enable the desire for learning and improvement to be realised.

7. A Just Culture is much more than just a standardised environment and reporting mechanism. It comprises both a set of beliefs and a set of duties that are expected from individuals as well as from the organisation as a whole. The beliefs and duties that underpin healthy reporting, and fair and effective investigation are based on the following principles:

- a. Individuals are encouraged to contribute actively to improving safety and will be commended for owning up to near misses, errors and violations that occur in an honest endeavour to do their best.
- b. The WAC, and all involved in it, acknowledges that it is the human condition to make errors and understands the role that human factors play in safety.
- c. Club members, regardless of status or experience, must know they will be treated in a fair, consistent, objective and timely manner.
- d. Club members and staff, whatever their role, have a responsibility to actively participate in reporting errors and violations and to support learning and improvement in safety. Failing to report errors and violations is not acceptable and may, in itself, result in disciplinary action.

8. The **Just Culture of WAC** will be a consistent system for the management of errors and infractions. This is neither a 'blame' nor 'no-blame' culture. All incidents will be investigated by appropriate personnel, and where incidents are reported in a

timely and open manner, the presumption of blamelessness will be the norm and the expectation is that disciplinary action will be the exception. Nevertheless, the following serious failures of club members to act responsibly will still attract disciplinary action:

- a. Premeditated or intentional acts of damage to club equipment or property.
- b. Actions or decisions involving recklessness which no reasonably careful club member, with relevant training and experience, would take.
- c. Failure to comply with club Flight Orders, instructions and procedures.
- d. Actions or decisions where risks are identified but ignored or taking the risk is unjustified.
- e. Failure to report incidents as required by this policy and club Flight Orders.

Initial Review

9. The Chief Flying Instructor (CFI) is to conduct an initial review of all human-factor-related safety events to determine whether to deal with the matter using the Just Culture Framework or the WAC's constitutional Disciplinary process. If the event is dealt with under the Just Culture Framework, the CFI may consider their initial review as sufficient and no further investigation is required. Alternatively the CFI may direct a full safety investigation to occur.

10. Not all safety events, particularly of a minor nature, require a full and comprehensive review/investigation. The CFI will make a sensible, informed decision if the event is not perceived to pose a significant risk. The CFI should advise the WAC Executive Committee if a review or safety investigation highlights any possible breaches of orders, obvious criminal or disciplinary actions, or events that have produced a notifiable injury or illness⁵, or serious damage.

Decide and Respond

11. The CFI is to determine if the facts indicate that a human error, at-risk or reckless behaviour has occurred. In reaching this decision, the CFI may make use of the Responsibility Assessment flow chart and is to assess the need for administrative or disciplinary action. In determining responsibility, the Substitution and Routine Tests are to be applied.

12. The CFI is expected to exercise common sense and good judgement in reviewing an event under the Just Culture Framework. The CFI must consider that while guidance material details acceptable behaviour it does not absolve any individual from using their best judgement to ensure the safety of aircraft and

personnel. Where safety imperatives demand, the acceptable behaviour may be deviated from, provided that a convincing case can be offered in retrospect.

13. The CFI should confer with the WAC Executive Committee before initiating any potential disciplinary action when any behavioural classification of wilful behaviour, recklessness, or violation for personal gain is identified.

14. The CFI is to determine appropriate interventions and lessons learned. Interventions must address the cause/s of the event.

15. Effective intervention strategies designed to prevent recurrence of an error, at-risk or reckless behaviour relies on thorough investigation data. This is not only true in terms of those interventions that are implemented immediately in order to prevent the recurrence of a unique event, but it is also particularly important when building a database of the less direct causal factors.

16. The CFI is to ensure that the results of any investigation, along with any identified interventions and/or lessons learnt, are captured in the report.

Event Investigation Process

17. The Event Investigation Process diagram illustrates how human-factor-related safety investigations should proceed. It directs the CFI to the Responsibility Assessment flowchart, which provides guidance as to how certain behaviours should be classified.

Responsibility Model

18. The Responsibility Model is intended for use by and relies on the results of an appropriate investigation to resolve any question of responsibility. Application of the Responsibility Model requires a degree of sensitivity and discretion but will ensure an impartial and consistent judgement as to what are deemed acceptable and unacceptable behaviours. It relies upon an appropriate investigation having been conducted and will not be used in isolation or without the support of such an investigation. Application of the Responsibility Model to the outcomes of the initial review and investigation by the CFI will then lead to one of eight behavioural classifications, which can be considered in three categories:

- a. **Human Error.** Where neither actions nor consequences were as intended by those involved, the actions would be considered as errors (slips and lapses).
- b. **At-risk Behaviour.** A behavioural choice which increases risk where risk is not recognised, or is mistakenly believed to be justified. Where the

actions were planned but the consequences were not understood. This category includes mistakes, routine and situational violations, and violations for WAC gain.

- c. **Reckless Behaviour.** A behavioural choice to consciously disregard an obvious and unjustifiable risk or unjustifiable departure from expected behaviour. This category includes violations for personal gain, recklessness and wilful behaviour.

Responsibility Assessment Flow Chart

19. The Responsibility Assessment flow chart is used to determine an appropriate behavioural classification for an error, at-risk or reckless behaviour, and provides a framework for assessing the relative levels of responsibility or accountability ascribed to that behavioural classification. Using the Responsibility Assessment flow chart, the CFI will answer the questions posed based on the information gathered during the initial review or investigation. If clarification or further information is necessary to answer the questions, the CFI must verify any issues before continuing with the analysis. The Just Culture policy requires the CFI to assess whether actions were reasonable, given the conditions at the time of the occurrence, by applying the following Substitution and Routine tests when answering each question throughout the Responsibility Assessment flow chart:

- a. **The Substitution Test.** This considers whether another reasonably careful individual with the same competence would behave in the same way in similar circumstances. This test is used to assess whether another individual sharing similar knowledge, experience and perceptions, special skills, education and training, physical characteristics and mental capacity might have reasonably followed the same course of action. If the answer is yes, then it is inappropriate for the individual to be deemed responsible. This will be an evaluation by the CFI that may include advice from reasonably careful individuals who have the same qualifications as well as similar levels of experience. The individual circumstances of an event will dictate how the response to each question is determined. However, the following is a guide to issues that will be considered when answering the specific questions in the Responsibility Assessment flow chart:
 - (1) Did the person knowingly ignore an obvious risk, and was taking the risk unjustifiable?
 - (2) Was there malicious intent for the consequence?

- (3) Did the person intentionally break guidance? Did the individual knowingly contravene guidance in order to undertake the task?
- (4) Did the person select a correct plan of action? Would the plan of action selected by the individual have ever achieved its goal?
- (5) Given the conditions at the time, could the person have completed the task in accordance with the guidance? Given the circumstances the individual found themselves in, was it possible to complete the task in line with the guidance?
- (6) Were the conditions outside normal experience and practice? Did the individual find themselves in a situation that differed considerably from the usual operating environment?
- (7) Was the action of benefit to the person? Did the individual consider that their actions were for the good of the organisation, or were they based on blatant self-interest?

b. **The Routine Test.** This considers whether the event in question has happened before to either the individual or the organisation. Establishing whether the behaviours are routine or whether the event has happened previously will have a direct influence upon determining the most appropriate intervention. This test seeks to ascertain whether:

- (1) the actions of the individual were a reflection of the normal way of working;
- (2) this would also align with the findings of the Substitution Test in subparagraph above;
- (3) the individual had been involved with similar occurrences before; and
- (4) the organisation had experienced similar occurrences before, but that remedial actions had failed to prevent recurrence.

Behavioural Classifications

20. Applying the Substitution and Routine Tests, and responding to the questions in the Responsibility Assessment flow chart, will lead the CFI to one of a number of behavioural classifications. These are summarised below:

- a. **Error (Slip or Lapse).** An error is an unintentional deviation from expected behaviour. Errors can either be due to an individual doing something other than what they intended to do (slip) or failing to do something because of an issue with concentration or memory (lapse). For example, misinterpreting information on a gauge, pulling an incorrect circuit breaker

(slip); or forgetting to complete the last step of a task because of an interruption (lapse).

- b. Mistake. A mistake is an action that goes according to plan, but the plan is inadequate to achieve the desired outcome. Known as a cognitive error. A mistake occurs when an individual does what they planned to do, but where they ought to really have done something else if they wanted to achieve their goal. For example, using out of date information to perform a task.
- c. Routine Violation. In some situations, given the conditions at the time, the person may have considered that deliberately not following or actively violating the guidance may have been the only way to complete a task. Individuals may assert that, given the circumstances in which they found themselves, that was the only way to get the task done.
- d. Situational Violation. This classification covers those unusual occurrences where guidance is deliberately not followed, or violated, in unforeseen or undefined situations. Not every situation can be anticipated when individuals find themselves in unforeseen or undefined situations.
- e. Violation for WAC Gain. This classification covers situations in which an individual deliberately fails to follow guidance but with the aim of benefiting the organisation. An individual may believe that their actions were for the good of the organisation.
- f. Violation for Personal Gain. This classification covers deliberately not following guidance with the aim of benefiting the individual. Actions can be 'corner-cutting' to complete a flight more quickly or to circumvent seemingly laborious procedures. They can also be thrill-seeking as a means of alleviating boredom or as a demonstration of ability or skill.
- g. Recklessness. A person is reckless if: knowing that there is risk that an event may result from his or her conduct or that a circumstance may exist, he or she takes that risk, and it is unreasonable for the person to take the risk having regard to the degree and nature of the risk that he or she knows to be present. Recklessness implies that an individual knowingly ignored the potential consequences of their actions.
- h. Wilful Behaviour. Wilful behaviour involves doing or omitting an act that to the person's knowledge is likely to cause loss of life or bodily injury or damage to property.

Determining Appropriate Interventions

21. The resulting behavioural classification aligns with a relative level of responsibility, which is determined largely by the intention of the individual's behavioural choices and consequences. Dependent upon the behavioural classification, changes may be made at the individual, situation or environment level and may require appropriate administrative or disciplinary action. A Just Culture requires a transparent and easily applied process to support a CFI to determine what behaviour is broadly acceptable and to determine which behaviours will ordinarily be managed through disciplinary action. These are violation for personal gain, recklessness and wilful behaviour. The vast majority of other behaviours will be managed through improving performance-influencing factors, although the reality of New Zealand health and safety law means that, no matter what the behavioural classification, in the case of some events (e.g. notifiable injury or illness or death) there might be separate legal proceedings. The CFI will consider the Proportionality Test and determine an intervention suited to the attributed behaviour classification using the following guidance:

- a. **The Proportionality Test.** This considers the safety value that any punishment would have. This test will be used to determine the appropriate extent of any administrative or disciplinary action in terms of its contribution to safety, learning and improvement.
- b. **Determining the Intervention.** In order to determine intervention(s) the CFI will consider what needs to happen to reduce the likelihood of recurrence at both the individual level and the organisational level. For an intervention to be successful in its aim to reduce the likelihood of recurrence, it needs to be appropriate to the type of behavioural classification determined using the Responsibility Assessment flow chart. Errors and violations all have differing psychological and motivational precursors and it is therefore essential that consideration is given to this when developing an intervention. The interventions and corrective actions are outlined in the [Determination Intervention](#) table below.

Review

22. The Club President/Captain is to analyse human-factor-related safety event reports, monitor trends and report these to the WAC Executive Committee.

23. The CFI is to ensure that decisions made as to responsibility are communicated effectively to Club members. In addition, the CFI is to ensure that human-factor-related safety event reports are available to all personnel and are routinely briefed at the club to ensure that interventions and lessons learnt are widely understood.

Determining Intervention

Behaviour Intervention/Corrective Action	Behaviour Intervention/Corrective Action
Error (Slip or Lapse)	Review task for human performance issues, particularly if errors occur regularly.
	Encourage reporting from individuals to uncover other potential error-inducing tasks.
	Console the individual (see note 1).
Mistake	Address cognitive errors through performance management and training.
	Encourage reporting from individuals to uncover other error-inducing tasks.
	Console and/or coach (see note 2) the individual.
Routine Violation	Address any systemic problems.
	Encourage reporting from individuals to uncover other potential sub-optimal situations.
	Reinforce acceptable/unacceptable behaviour with individuals and management.
	Apply appropriate coaching or Administrative Action where necessary.
Situational Violation	Review how individuals are trained to react in emergency situations.
	Apply appropriate coaching or Administrative Action where necessary.
Violation for WAC Gain	Address any systemic problems.
	Reinforce acceptable/unacceptable

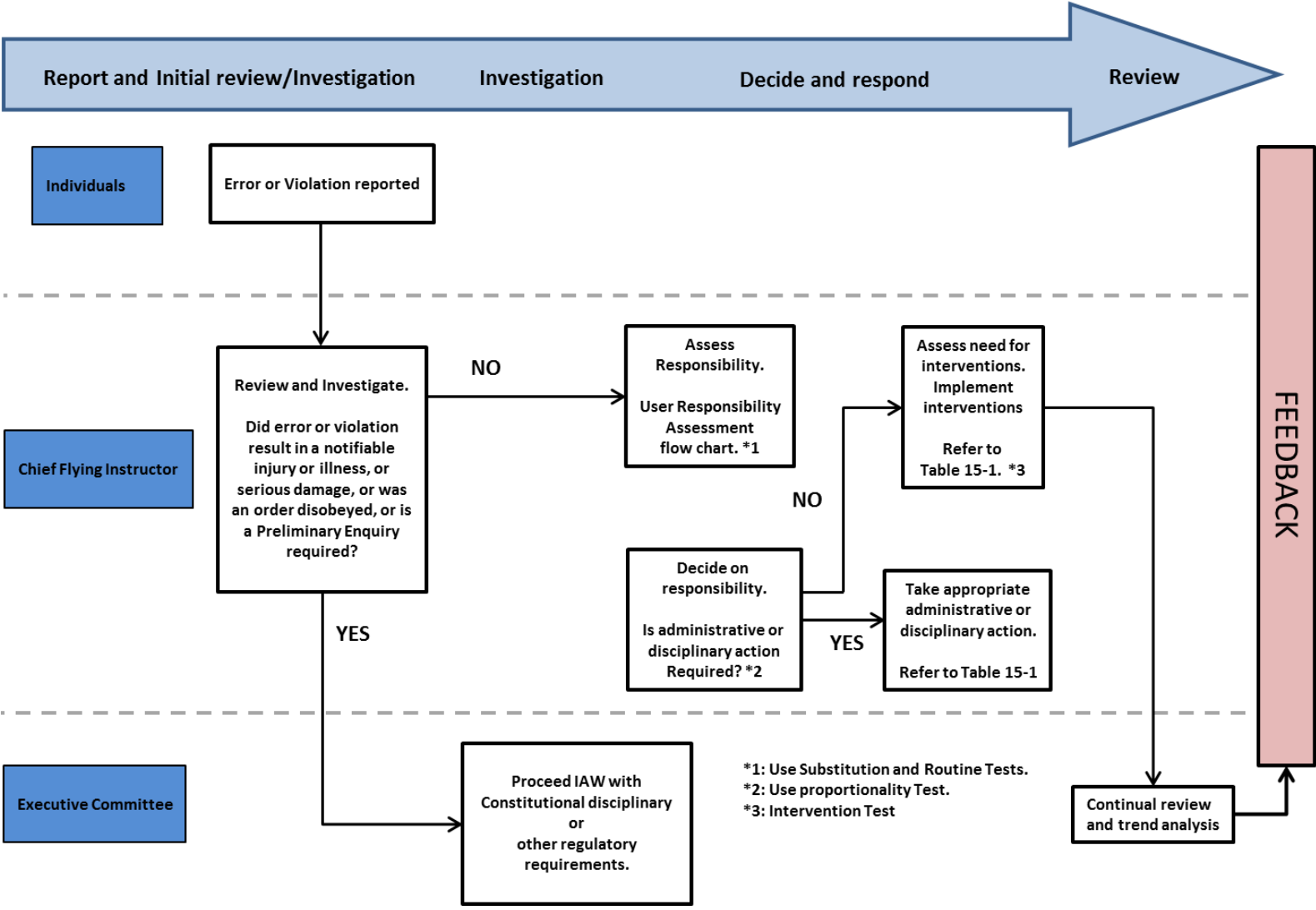
	behaviour, norms or expectations with individuals.
	Apply appropriate coaching or Administrative Action where necessary.
Violation for Personal Gain	Manage through disciplinary action.
	Action to address any systemic problems may also be necessary.
Recklessness	Manage through disciplinary action.
	Action to address any systemic problems may also be necessary.
Wilful Behaviour	Manage through disciplinary action.
	Action to address any systemic problems may also be necessary.

NOTE

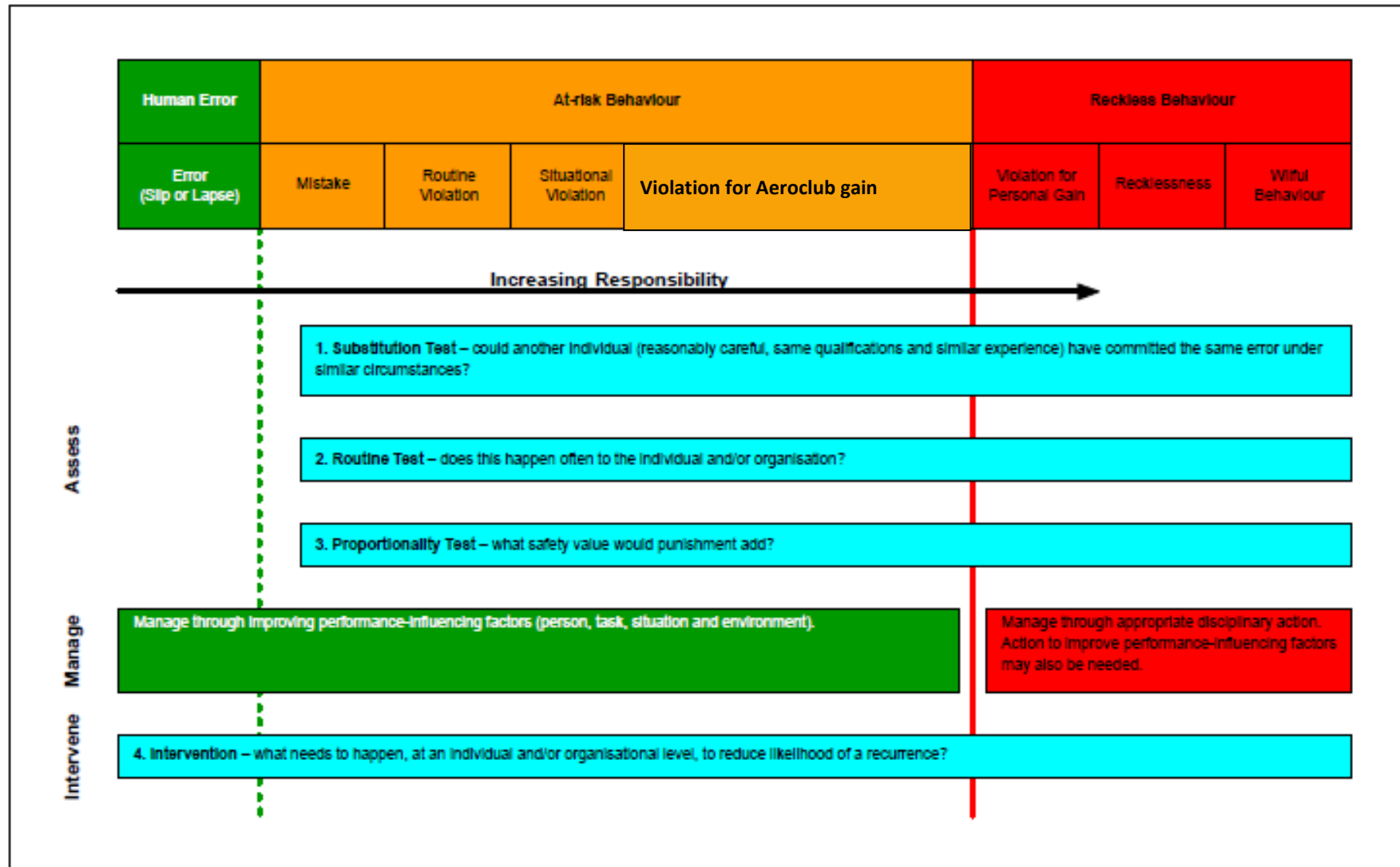
1. Console in this context means to discuss the human error or mistake made with the individual in order to understand how it occurred and how it may be avoided or better managed in the future.

2. Coach in this context means to discuss the risks associated with the behavioural choice made by the individual. The intent is to raise the individual's awareness and perception of the risk taken, establish an understanding of the consequences and align the individual with command's expectations as to how the risk should be managed in the future.

Event Investigation Process



Responsibility Model



Responsibility Model

Responsibility Assessment Flow Chart

