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Applying Just Culture Principles in an OFDM Program, a pilot's view

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Operational Flight Data Monitoring

- is a proactive tool where digital flight data from routine (daily) operations is collected and analyzed in order to improve safety of the flight operations.
- Shall be non-punitive & protect sources of the data
- Gives you objective, raw data...BUT...



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... OFDM does not give you CONTEXT...

- CONTEXT needs to come from the concerned flight crews.
- Without CONTEXT, little ability for the organisation to come to the right conclusions and learn the right lessons
- Without CONTEXT, suboptimum (or no) improvement to Flight Safety



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That's why the priority of the organisation must be to built a culture of trust, clear and acceptable values for all in order to:

- Encourage honest proactive reporting
- Facilitate the open exchange of information between the front-enders, management and the organisation in general...

...what is commonly referred to as JUST CULTURE...



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How is your organisation?

Pathological	Bureaucratic	Generative
Information is hidden Messengers are shot Responsibilities are shirked Bridging is discouraged Failure is covered up New ideas are crushed	Information may be ignored Messengers are tolerated Responsibility is compartmentalised Bridging allowed but discouraged Organization is just & merciful New ideas create problems	Information is actively sought Messengers are trained Responsibilities are shared Bridging is rewarded Failure causes inquiry New ideas are welcome



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So, What is Just Culture, then?

Non-punitive?

Blamefree?

IMMUNITY?



Free from accountability?



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“A culture in which front line operators or others are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but where gross negligence, willful violations and destructive acts are not tolerated”

(ICAO)

...or...



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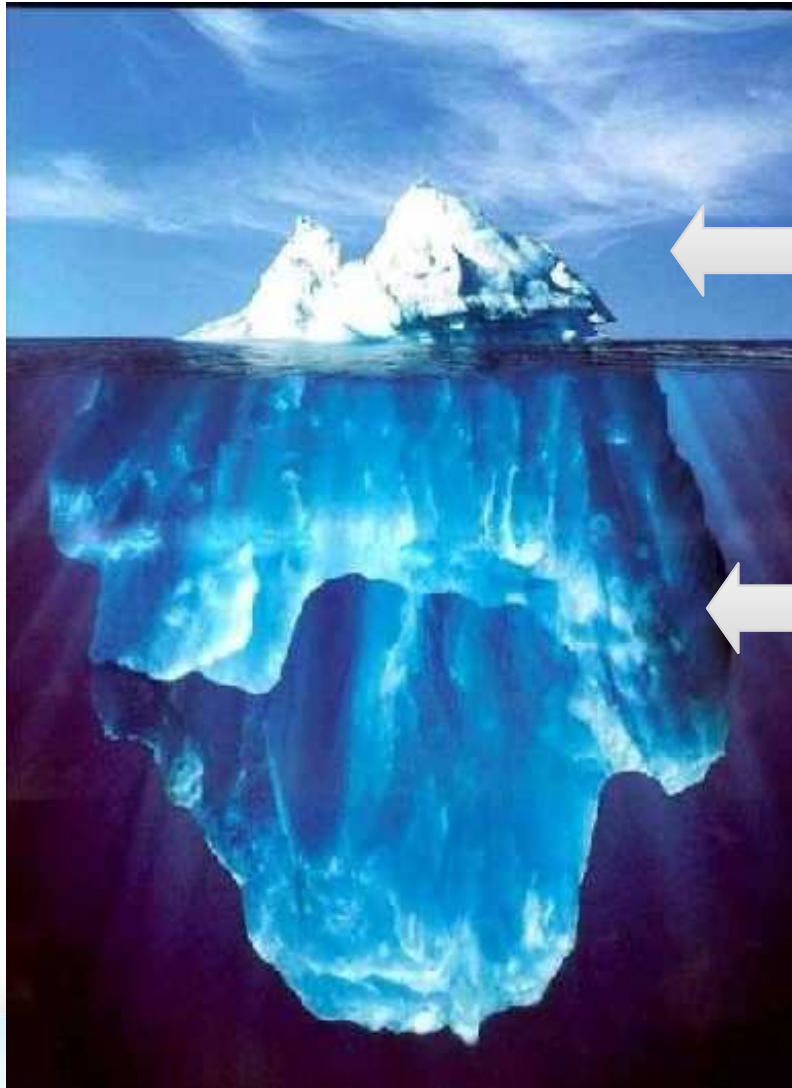
“...an atmosphere of trust in which people are encouraged, and even rewarded, for providing essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behaviour.” Prof James Reason



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Why do we need Just Culture?



What you know

What you don't know

(but what should keep you awake at night!)



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In short:

- If we want access to that data, we need to convince people to acknowledge and be honest about their mistakes...
- ...And this is against anything we intuitively learned since childhood!



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- Errors are often just symptoms of underlying organizational, procedural or environmental causes.
- If you look for “bad apples” you might not get to the root of the problem
- Important to correctly differentiate between errors and willful acts



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OFDM & Just Culture, what to look for

- A proper OFDM Agreement, in line with industry standards, with involvement of your pilot association.
- Proper Training for all people involved, including Just Culture Training and Communication training.
- Protection of data and its source.
- Clear role and authority of the “Gatekeeper”
- A Clear Just Culture policy understood by all stakeholders and communicated throughout the organisation .
- Definitions of “acceptable” / “unacceptable” behaviour,
- Transparent Process to deal with actions in the “grey area”.
- Fair treatment being applied.



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Food for thought & some examples

- At some carriers a trend to introduce pilot KPIs based on, among others OFDM data.
- Confidentiality to be compromised and identified data to leave the OFDM “Safe Haven” for use in training or fuel economy programs.
- Undermines the confidentiality and the trust not only of the OFDM program but of the whole Safety Structure of the operator...



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Food for thought & some examples

- Direct access from departments outside the Safety office to identified data! (Training or Flight operations department)



- Leads to potential loss of trust in the system
- Undermines the authority of the safety department!!



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- Not everything you can do with data is actually going to make your operation safer
- Your top priority must be **SAFETY** and for that you need to keep the integrity and trust intact.
(Remember Trust is earned not decreed)
- If you use OFDM data for training purpose, as in ATQP, use trend data only, set up specific training exercises based on fleet, airport and issues identified by the OFDM program.



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Dealing with Willful Violations of S.O.P's:

- Debrief by OFDM officer(& Crew Rep.) & put into Focus Group (monitored 12 months)
- Repeat offence: De-identified case discussed with Safety Officer, Fleet chief and Crew Representative. (depending on severity)
Unanimous decision required to lift confidentiality.
- If repeat offence within another 6 months, case brought before OFDM group by Safety Officer for further action.



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Dealing with Willful Violations of S.O.P's:

- Focus on clear transparent and understandable processes to deal with violations
- Differentiate between willful violations and training issues or procedural shortcomings
- If continuous willful disregard of procedures, final “warning” by Pilot Representative (positive peer group pressure)



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A word on Communication...

- Communicate actively and regularly on OFDM trends, findings, goals...
- Communicate positively, get the TONE right, choose your wordings carefully...
- Have an “open door policy” at OFDM, encourage people to “come and have a look”...
- Communication is a vital part of “building the trust”



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If you get it wrong...

- People will not be honest in giving you the context... your organisation will not be able to address its safety issues adequately...
- People will be resistant to output from the OFDM group, ie retraining will be seen as punishment
- People will fly the OFDM instead of the aircraft...
- Negative Impact on your organisation's Safety Goals...



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To Conclude:

- **Just Culture is NOT a box-ticking exercise!**
- **It is a set of Ethics and Principles that need to be kept alive day after day**
- **Your organisation needs to live and breathe by Just Culture principles, this is not an easy exercise...**
- **There is no one for all miracle solution... your organisation needs to find its own path...BUT...**



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To Conclude:

- ... You're not alone...
- Use your resources both in-house and externally...
- Share your experiences... join EASA's EOFDM Forum...



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And Finally:

**DO NOT ONLY
TALK THE TALK**

**BUT
WALK THE WALK**



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