



EXPLORING THE JUST CULTURE CONCEPT

ENSURING BALANCED ACCOUNTABILITY
FOR INDIVIDUALS AND THE ORGANISATION
BY DESIGNING AND IMPROVING SYSTEMS
IN THE WORKPLACE.



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01: WHAT IS JUST CULTURE?

Just Culture is a systems thinking concept which emphasises that, generally, mistakes are a product of faulty organisational cultures, rather than brought about by the person or persons directly involved. In a Just Culture, after an incident, the question asked is, “What went wrong?” rather than “Who caused the problem?”. A Just Culture is the opposite of a Blame Culture.

A Just Culture helps create an environment where individuals feel free to report errors and help the organisation to learn from mistakes. This contrasts with a “Blame Culture” where individuals are fired, fined, or otherwise punished for making mistakes, but where the root causes leading to the error are not analysed, investigated and corrected. In a Blame Culture mistakes may be not reported but hidden, ultimately leading to unsatisfactory outcomes.

In a Just Culture environment, discipline is linked to inappropriate behaviour, rather than harm. This allows for individual accountability and promotes a learning culture. In this system, honest human mistakes are a learning opportunity for both the organisation and its employees. The individual who made the mistake may be offered additional training and coaching; however, wilful misconduct may result in disciplinary action such as termination of employment—even if no harm was caused.

Work on Just Culture has been applied to industrial, healthcare, aviation and other settings. It is most prevalent in highly regulated industries; however, to maintain a safe and healthy workplace, Just Culture should be applied in all industries and workplaces.

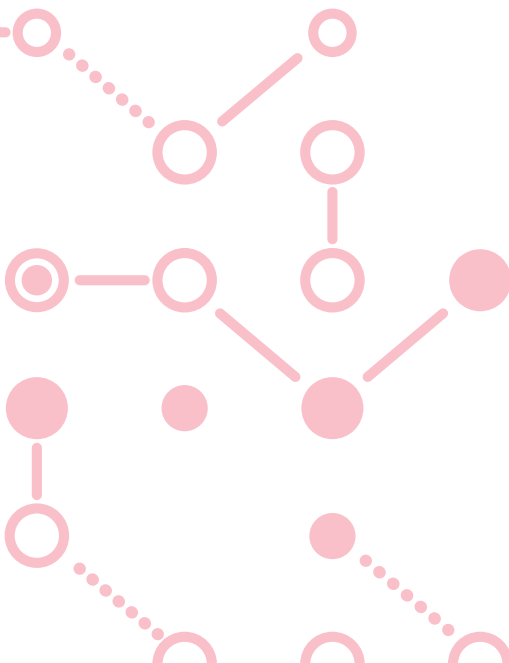
02: THE FOUNDATIONS OF A JUST CULTURE

Sidney Dekker (2007) states that blame-free is not accountability-free. But we should create accountability not by blaming people, but by getting people actively involved in the creation of a better system to work in. Accountability should lay out the opportunities (and responsibilities) for making changes so that the probability for harm reduces. Getting rid of a few people that made mistakes (or had responsibility for them) may not be seen as an adequate response. Neither is it necessarily the most fruitful way for an organisation to incorporate lessons about failure into what it knows about itself - into how it should deal with such vulnerabilities in the future.

Dekker also suggests a staged approach which allows you to match your organisation’s ambitions to the profession’s possibilities and constraints, the culture of your country and its legal traditions and imperatives.

- Step 1: Start in your own organisation. Don’t rely on anybody to do it for you! Make sure people know their rights and duties. See an incident as an opportunity to focus attention and learn collectively, do not see it as a failure or crisis. Start with building Just Culture from the beginning during basic education and training/ induction; make people aware of the importance of reporting. Implement debriefing and incident/stress management programs.
- Step 2: Decide who draws the line in your organisation. How to integrate practitioner peer expertise in the decision to handle the aftermath of an incident. Empowering and involving the practitioner is the best way for improvement.
- Step 3: Protect your organisation’s data from undue outside probing.
- Step 4: Decide who draws the line in your country. It’s important to integrate domain expertise in the national authority who will draw a line since a non-domain expert attempting to do this is fraught with risks and difficulties.

Unjust responses to failure are often a result of bad relationships rather than bad performance. Restoring those relationships, or at least managing them wisely, is often the most important ingredient of a successful response. One way forward is to simply talk together. Building good relationships can be seen as a major step toward Just Culture.



03: HEALTH & SAFETY MANAGEMENT SYSTEM

It is a legal requirement for your employer to publish a duly signed copy of the company Health and Safety Policy and display it in a prominent place within your workplace. However, are you aware of the systems and procedures that your company has put in place to manage health and safety. The best companies will develop and publish a Health & Safety Management System, making it available to all employees.

Various industries have their own version of the Health & Safety Management System; for instance, in aviation, defence and other highly regulated domains you may well come across documents entitled Safety Management System (SMS) or Safety & Environmental Management System (SEMS). Whilst the titles might vary the aims of the documented system are similar, to:

- Define and instantiate the Safety Policy within the Company by defining and facilitating a set of Safety (and Environmental) Management Requirements.
- Assure ourselves that our processes are and continue to be commensurate with best safety practice.
- Satisfy our customers that what we do is in accordance with suitable safety practice, is traceable and justified.
- Comply with applicable regulation and legislation.

The main objectives of the SMS are to ensure that:

- All safety-related projects are carried out competently.
- The requirements of the client, and the boundaries of safety responsibility, are clearly defined.
- All safety-related deliverables are subject to independent senior review before formal submission to the client to ensure that personnel do not sign-off, commit to or otherwise agree to unjustifiable or unsupported safety claims.
- Personnel are made aware of changes to relevant safety regulation and legislation in addition that lessons are learnt from safety incidents and accidents.

For an SMS (or SEMS) to work effectively requires three main components: organisational trust, safety leadership and an effective reporting system. Organisational trust is the body of the SMS, safety leadership can be viewed as the vascular system supporting the SMS and effective reporting provides the life blood to the system.

04: ORGANISATIONAL TRUST

When we talk about organisational trust, we should consider the following:

- An atmosphere of trust and psychological safety
- Organisational values
- Open Communication

Trust & Psychological Safety. When asked, organisations will maintain they have a “Just Culture” or a “Safety Culture”. Invariably this means that they have transcribed the provisions of the various regulations (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 and other domain specifics) and the definition of Just Culture into their safety documentation. Organisations will have a ‘safety culture’ or an approach to safety which aligns with their organisational culture. However, whether the culture is effective and achieves the overall aim is open to argument.

Organisations may be convinced that they have a Just Culture, but we would argue that they merely have a process in place that meets the regulatory requirement. Consequently, the Just Culture is often a process for making someone accountable and is a million miles away from being a ‘Culture’. One of the reasons for this omission is the way that ‘Just Culture’ is defined. Too often in the regulations the organisational trust dimension is missing. If an employee does not trust the organisation, how can the employee contribute without fear of retribution. James Reason talks about an ‘atmosphere of trust’ being the foundation of a Just Culture. Through creating an ‘atmosphere of trust’, we create an organisation that we all feel comfortable and confident to work in and is ‘psychologically safe’.

The most recent exponent of psychological safety is Amy Edmondson from Harvard Business School and I paraphrase what she has said. Psychological safety is all about a shared belief that the team is a safe place for interpersonal risk taking...and that in psychologically safe teams, the members feel accepted and respected. Further, psychological safety is a belief that no one will be punished or humiliated for speaking up with ideas, questions, concerns, or mistakes.

Within a psychologically safe environment the team is encouraged to communicate, express concerns, share ideas and ask questions resulting in the organisation being able to learn and grow whilst becoming more effective, efficient and durable.

The establishment of psychological safety requires a significant input from the leader who has an important role to play and must:

- Describe the work in terms of a learning problem or opportunity.
- Acknowledge their own fallibility.
- Ask a lot of questions.

05: ORGANISATIONAL VALUES

Culture is often viewed as 'system of shared values and beliefs' that lead to shared and accepted social behaviours. However, when discussing values in an organisation, it is important to understand that values need to be seen by the staff as credible and that the entire organisation buys into them...and 'lives' them. Clearly, to achieve this buy in, the organisation must first properly explain the organisational importance of these values and the operational context.

My own organisation uses values such as Trusted, Visionary and Exemplar which look good when displayed on the wall or as a logo on your Desktop. The challenge is for the organisation to clearly explain to staff what they mean for the day-to-day business

These values, once they have been explained need to be "lived" and need to be reflected in every aspect of the organisation's work, relationships with customers, regulators, and staff.

06: OPEN COMMUNICATION

To be effective, organisations must communicate openly and often. Moreover, they need to demonstrate that they really want staff to communicate openly, that communication will be respected and, if necessary, treated confidentially.

Employee loyalty, buy-in and commitment are far easier to achieve if there is a belief that the organisation is being open and honest about future plans, targets, concerns, challenges and initiatives – and how the employee fits into the picture.

Organisations and leaders must understand that communication is achieved through a number of media and should not be limited to memos, e-mails or leaflets.

Anecdotally, we joke about the water cooler conversations but leaders should see and value these opportunities to build credibility and trust in the organisation and its culture.

07: SAFETY LEADERSHIP

In this section of the paper I have drawn on Phillip Woodley's LinkedIn article discussing Just Culture in aviation which I thought made some excellent points.

Very often, "leadership" is misused to simply mean "managing people and processes" (what Phillip terms 'bean counter leadership'). In the context of an organisational culture that thrives on motivation and psychological safety, an organisation will need to display what is termed "ethical" or "compassionate" leadership as illustrated in the Figure below.



James Comey's view of Ethical Leadership incorporates a view of Culture. He states that Ethical Leadership is about "understanding the truth about humans and our need for meaning. It is about building workplaces where standards are high and fear is low. Those are the kind of cultures where people will feel comfortable speaking the truth to others as they seek excellence in themselves and the people around them."

Ethical leaders show empathy and understand their role is to support both the organisation and the people to achieve the company goals. They do this also by coaching, showing respect and "living" the values that the organisation promotes. Ethical leaders lead by example. They understand the importance of communication skills and interpersonal relationships and generate trust and respect within the organisation.

Identifying and developing such leaders will be one of the challenges that an organisation needs to address. Very often, people displaying the right human leadership qualities will not necessarily be those that put themselves forward, especially in cultures that are authoritarian, exploitive, or untrustworthy.

The challenge over time for the organisation will be to nurture a next generation of leaders to guarantee continuity and the ability for an organisation and its culture to adapt to a changing environment without compromising its core values.

In wider industry there is a wealth of data on what makes organisations and teams effective and successful (such as Google's Aristotle project) that we can draw on to effect change on how we view Culture in the industry context.

It is Phillip's belief that if we want to keep the concept of "Just Culture" relevant, we need to widen our horizon and scope to organisational culture in general. We need to bring industry and other organisations on board, as "economic entities", not just their safety departments.

08: REPORTING

The main reason for an organisation's reporting system under-performing is a culture of fear. Too often the fear of organisational retribution will discourage incident reporting.

A reporting culture means cultivating an atmosphere where people have confidence to report safety concerns without fear of blame. Employees must know that confidentiality will be maintained and that the information they submit will be acted upon, otherwise they will decide that there is no benefit in their reporting.

09: SOME NEXT STEPS

In 2015, the European Corporate Just Culture Declaration was issued. It was sponsored by nearly all of the main players in the European Aviation world. Unfortunately, the declaration has not made the impact that was first hoped. Supporting the Declaration was fifteen Key Principles.

Whilst the Declaration was focussed on the world of aviation, with a little modification it can be adapted to be appropriate for all domains and industries as shown below.

10: CORPORATE JUST CULTURE DECLARATION

The modified Corporate Just Culture Declaration reads as follows:

- Safety is of paramount importance to the public but also to industry.
- Safety is not only a legal requirement but also a key contributor to sustainable business. Any entity in industry has therefore a responsibility to maintain and improve safety.
- Staff working in industry, at all levels, have a safety responsibility and are key to a safe system.
- A safe system requires events that affect or could affect safety to be reported fully, freely and in a timely manner as needed to facilitate their investigation and the implementation of lessons learnt.
- Just Culture lies at the heart of an effective reporting system and such a system is needed in all organisations to maintain and improve safety.
- This Declaration supports existing legislation, in particular Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 (and other equivalent international regulations) on the reporting, analysis and follow-up of occurrences in industry, and is fully consistent with applicable rules.
- Each organisation should, after consultation with their staff representatives, implement internal rules that are best suited to its internal and external specificities. These internal rules should be supported by documented processes and applied consistently through the organisation.
- This Declaration constitutes a set of key principles that each organisation is encouraged to implement in the context of its Just Culture internal rules.

11: KEY PRINCIPLES OF A JUST CULTURE

Acting safely is a top priority.

1. Staff, at all levels, should be, as a starting point, considered to act in the interest of safety, in a manner commensurate with the training, experience and professional standards that fit their position or function. To achieve this, organisations are responsible for providing their staff with the appropriate environment, tools, training and procedures.
2. It is acknowledged that, in an industry environment, individuals, despite their training, expertise, experience, abilities and good will, may be faced with situations where the limits of human performance combined with unwanted and unpredictable systemic influences may lead to an undesirable outcome.
3. Analysis of reported occurrences by organisations should focus on system performance and contributing factors first and not on apportioning blame and/or focus on individual responsibilities, except in the cases foreseen under RIDDOR and other applicable legislation.
4. When assessing individual responsibility, organisations should focus on determining if actions, omissions or decisions taken were commensurate with experience and training, and not on the outcome of an event.
5. Reporters of safety information, and any other person mentioned in the report, are protected from adverse consequences, in accordance with RIDDOR (and other equivalent international regulations).
6. Whilst acknowledging that adverse events can frequently be the driver for analysis, positive behaviour and actions should be captured and encouraged.
7. Organisations should promote effective implementation of Just Culture principles within the organisation at all levels and with all parties, including their representatives. All should actively foster mutual trust and respect and promote support and cooperation to build the necessary trust across the organisation. Staff should be educated in Just Culture principles and all relevant documentation should be made available.
8. Just Culture internal rules should include, amongst others, the definition of a process, including the actors involved, to determine an unacceptable behaviour, in accordance with its description in RIDDOR (and other equivalent international regulations).
9. Just Culture internal rules should document how safety data is managed, stored, protected and disclosed. It should also document to what extent the organisation intends to share anonymised data for safety learning purposes.
10. Support provided by organisations, in cases where staff are subject to external procedures based on an occurrence they have reported or been involved in, reinforces the mutual trust that is necessary to ensure an effective Just Culture.
11. A consistent and effective Just Culture environment requires going beyond publication of Just Culture internal rules.
12. To effectively implement a Just Culture staff at all levels, as well as top management, should understand and accept their responsibility with regards to Just Culture principles and internal rules and their promotion.
13. Organisations, in cooperation with involved parties, including their competent authority, should define how they intend to continuously promote and stimulate the implementation of Just Culture principles and practices throughout the organisation.
14. Organisations should regularly review and assess the maturity of their Just Culture internal rules and compare it to the Just Culture perception within the organisation. Benchmarking may also be of benefit and may be considered.

12: FINAL THOUGHTS

Whilst there are some domains who regularly engage with the concept of Just Culture, there is an opportunity for it to be adopted industry-wide for the benefit of the organisation.

Many of the subjects discussed in this paper are good management anyway so organisations may already be some way down the road to a Just Culture.

Just Culture is not just for highly regulated or high risk domains.





- The Bramery, 44 Alstone Lane, Cheltenham. GL518HE.
- 160 Rombourne, Aztec West, Bristol, BS32 4TU.

[@CDS_Defence](#) • enquiries@cdsds.uk • www.cdsds.uk