



Stakeholder Consultation: Implementation of a Just Culture Body in Ireland



1 Executive Summary

2

3 European regulation (EU) 376/2014 ('the Regulation') on occurrence reporting¹ requires each
4 Member State to designate a body responsible to ensure, as per paragraphs 6,9, and 11 of article 16:

- 5 • Member States shall refrain from instituting proceedings in respect of unpremeditated or
6 inadvertent infringements of the law which come to their attention only because they have
7 been reported pursuant to Articles 4 and 5;
- 8 • employees and contracted personnel who report or are mentioned in occurrence reports
9 collected in accordance with Articles 4 and 5 shall not be subject to any prejudice by their
10 employer or by the organisation for which the services are provided on the basis of the
11 information supplied by the reporter; and
- 12 • each organisation established in a member State shall, after consulting its staff
13 representatives, adopt internal rules describing how 'just culture' principles, in particular
14 the principle of non-prejudice, are guaranteed and implemented within that organisation.

15 DTTAS has designated the IAA as the body responsible², commonly referred to as the 'Just Culture
16 Body'. Employees and contracted personnel may report to the IAA just culture body (IAA JCB)
17 alleged infringements of the rules on protection of information sources as detailed in article 16 of
18 Regulation 376/2014. The IAA JCB shall advise the relevant authorities in Ireland concerning
19 remedies or penalties for infringements of this Regulation. The penalties provided for shall be
20 effective, proportionate and dissuasive.

21 ***This document outlines the reporting mechanism and processes to be applied by the IAA to fulfil***
22 ***this mandate.***

23

24 Note:

25 *The proposed national legislation also provides a mechanism for redress for any person who believes*
26 *they have been prejudiced, by allowing them lodge a complaint to the Workplace Relations*
27 *Commission. Adjudication Officers of the Workplace Relations Commission (WRC) are statutorily*
28 *independent in their decision making duties as they relate to adjudicating on complaints and their*
29 *process is not detailed in this document.*

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¹ Regulation (EU) No 376 of 2014, see https://eur-lex.europa.eu/2014_376

² The required Statutory Instrument is in the approval process, DTTAS advise it will be available in Q2 2020.

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52 Chapter 1: Understanding the Role of the Just Culture Body

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54 Legislative Basis

55

56 ICAO Annex 19 Safety Management

57 ICAO Annex 19³ requires States to establish safety data collection and processing systems (SDCPS) to
58 capture, store, aggregate and enable the analysis of safety data and safety information. It also
59 mandates that States establish mandatory and voluntary safety reporting systems and that States
60 shall accord protection to safety data captured by, and safety information derived from, voluntary
61 safety reporting systems and related sources, including individuals and organisations.

62 The protection of safety data, safety information and related sources is essential to ensure their
63 continued availability, since the use of safety data and safety information for purposes other than
64 maintaining or improving safety may inhibit the future availability of such data and information, with
65 a significant adverse effect on safety. For this reason, ICAO Annex 19 further mandates States to
66 ensure that safety data or safety information is not used for:

- 67 a) disciplinary, civil, administrative and criminal proceedings against employees, operational
- 68 personnel or organizations;
- 69 b) disclosure to the public; or
- 70 c) any purposes other than maintaining or improving safety;

71

72 European Occurrence Reporting Regulation

73 In the EU, the ICAO Annex 19 requirements are given legal effect in Regulation (EU) No 376/2014 on
74 the reporting, analysis and follow-up of occurrences in civil aviation.

75 The Regulation recognises that the availability of occurrence information for the improvement of
76 safety depends on a relationship of trust between the reporter and the entity in charge of the
77 collection and assessment of the information.

78 The Regulation further recognises⁴, in order to ensure the confidence of employees or contracted
79 personnel in the occurrence reporting system of the organisation, the information contained in
80 occurrence reports should be protected appropriately and should not be used for purposes other
81 than maintaining or improving aviation safety. The internal 'just culture' rules adopted by
82 organisations pursuant to this Regulation should contribute in particular to the achievement of this
83 objective.

84 In addition, it recognises⁵ that the civil aviation system should promote a safety culture facilitating
85 the spontaneous reporting of occurrences and thereby advancing the principle of a just culture. Just
86 culture is an essential element of a broader safety culture, which forms the basis of a robust safety
87 management system.

88 While a just culture should encourage individuals to report safety-related information, the
89 Regulation does not absolve individuals of their normal responsibilities. In this context, employees

³ For information on ICAO and ICAO Annex 19 see: <https://www.icao.int/safety/SafetyManagement>

⁴ As outlined in recital (34) of Regulation (EU) No 376/2014

⁵ As outlined in recital (36) of Regulation (EU) No 376/2014

90 and contracted personnel should not be subject to any prejudice on the basis of information
91 provided pursuant to this Regulation. There are exceptions to this principle such as wilful
92 misconduct or where there has been manifest, severe and serious disregard with respect to an
93 obvious risk and profound failure of professional responsibility to take such care as is evidently
94 required in the circumstances, causing foreseeable damage to a person or to property, or seriously
95 compromising the level of aviation safety.

96 The establishment of a 'just culture body' as required by article 16(12) provides employees and
97 contracted personnel the opportunity to report breaches of the principles delimiting their protection
98 as established by this Regulation, and ensure they are not penalised for so doing. The Regulation
99 requires the Irish State to define the consequences for those who infringe the principles of
100 protection of the reporter and of other persons mentioned in occurrence reports and to adopt
101 remedies or impose penalties as appropriate.

102

103 [Statutory Instrument S.I. No XXX of 2020⁶](#)

104 Regulation titled European Union (Reporting, Analysis and Follow-up of Occurrences in Civil Aviation)
105 Regulations 2020 will designate the IAA as the competent authority in the State for the purposes of
106 Regulation (EU) No. 376/2014.

107 It also designates the IAA as the body responsible for the implementation of paragraphs 6, 9 and 11
108 of Article 16 of Regulation (EU) No. 376/2014, that is, the just culture body and makes provision for
109 redress for alleged contravention of Regulation 376/2014 by amending the Workplace Relations Act
110 2015.

111

112 [Separate Roles of IAA and WRC](#)

113 There are two separate but related roles to be considered in the application of Just Culture in
114 Ireland:

115 Firstly, the IAA's role as Just Culture Body is to ensure:

- 116 a) there is refrain from instituting proceedings in respect of unpremeditated or inadvertent
117 infringements of the law,
118 b) that an employer or an organisation for which the services are provided do not subject any
119 personnel to any prejudice on the basis of the information supplied by the reporter, and
120 c) that each organisation, after consulting its staff representatives, adopt internal rules
121 describing how 'just culture' principles, in particular the principle of non-prejudice, are
122 guaranteed and implemented within that organisation.

123

124 Secondly, is the role of the Workplace Relations Commission (WRC) in providing a forum for any
125 person to seek redress if they believe they have been prejudiced, by allowing them lodge a
126 complaint. Following the initial WRC process for hearing such complaints by the Adjudication Officer
127 of the WRC the below outcomes may be arrived at:

- 128 a) declare that the complaint was or was not well founded,

⁶ European Union (Reporting, Analysis and Follow-up of Occurrences in Civil Aviation) Regulations 2020 is pending final publication, reference to S.I. will be added when available.

- 129 b) require the employer to take a specified course of action,
130 c) require the employer to pay to the employee compensation of such amount (if any) as the
131 adjudication officer considers just and equitable.

132 Adjudication Officers of the WRC provide a statutorily independent decision making forum, assessing
133 complaints referred to them by the WRC Director General.

134 The Adjudication Officer hold hearings where both parties are given an opportunity to present
135 evidence relevant to the complaint. Hearings of the WRC are held in private. However, complaints
136 may, in certain instances, be disposed of by means of written procedure (i.e. without hearing). The
137 Adjudication Officer will not attempt to mediate or conciliate between the parties, it is an
138 adversarial process. Parties may be accompanied and represented at hearings by a trade union
139 official, an official of a body that, in the opinion of the Adjudication Officer, represents the interests
140 of employers, a practicing barrister or practicing solicitor or any other person, if the Adjudication
141 Officer so permits.

142 For further information on the WRC process please visit:
143 [https://www.workplacerelations.ie/en/what-we-do/employment-rights-](https://www.workplacerelations.ie/en/what-we-do/employment-rights-information/adjudication_services/)
144 [information/adjudication_services/](https://www.workplacerelations.ie/en/what-we-do/employment-rights-information/adjudication_services/)

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146 Protected Disclosure Act 2014

147 The Protected Disclosure Act 2014 makes provision for persons to report a protected disclosure, as
148 defined in Article 5 of the Act, to a person prescribed by the Minister. In the case of all matters
149 relating to the management of Irish controlled airspace, the safety regulation of Irish civil aviation
150 and the oversight of civil aviation security in the State, the prescribed person is the Company
151 Secretary of the Irish Aviation Authority.⁷

152 As outlined in the preamble to Directive (EU) 2019/1937⁸ ('the Directive') the importance of
153 whistleblower protection in terms of preventing and deterring breaches of EU rules on transport
154 safety, which can endanger human lives, has already been acknowledged in Regulation (EU) No
155 376/2014, which provide for tailored measures of protection for whistleblowers as well as specific
156 reporting channels. The Directive clearly states that the specific rules on the reporting of breaches
157 provided for in Regulation (EU) 376/2014 shall apply. The provisions of the Protective Disclosure Act
158 shall be applicable only to the extent that a matter is not mandatorily regulated for in Regulation
159 (EU) 376/2014⁹.

160 **It must be therefore noted that the Protected Disclosure may not be utilised in lieu of the**
161 **reporting obligations of Regulation (EU) 376/2014.**

162 The IAA process for protected disclosures is managed separately to the roles and functions of the
163 Just Culture Body.

164

⁷ As listed in S.I. No. 339/2014 - Protected Disclosures Act 2014 (Section 7(2)) Order 2014 list.

⁸ DIRECTIVE (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons who report breaches of Union law. Ireland has until 17 December 2021 to bring into force the laws, regulations and administrative provisions necessary to comply with this Directive.

⁹ Detailed in Article 3(1) of Directive (EU) 2019/1937

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166 Interaction of the Just Culture Body Role with Existing Obligations of the Competent 167 Authority

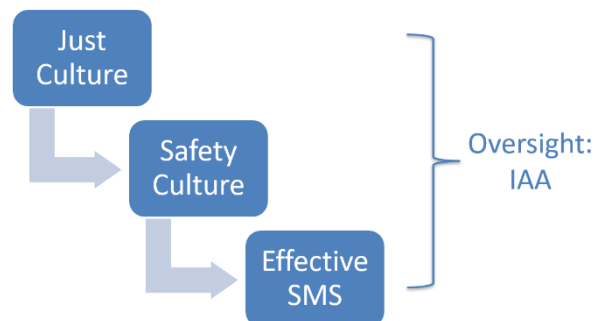
168 Just culture exists as a key enabler in the
169 broader context of a safety culture and of
170 safety management systems (SMS). An SMS is
171 a systematic approach to managing aviation
172 safety including the necessary organisational
173 structures, accountabilities, policies and
174 procedures, and includes any management
175 system that, independently or integrated
176 with other management systems of the
177 organisation, addresses the management of
178 safety. If the personnel do not perceive that there is a just culture in their organisation, the
179 effectiveness of occurrence reporting system and of the safety management system will be
180 undermined.

'just culture' means a culture in which front-line operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but in which gross negligence, wilful violations and destructive acts are not tolerated

Regulation (EU) 376/2014

181 Regulation (EU) 2018/1139 and its associated Implementing rules require various certified
182 organisations involved in aviation to have a safety management system. The oversight of their SMS
183 is conducted by the national certifying authority referred to as the 'competent authority'. In Ireland,
184 the competent authority for the implementation of Regulation (EU) 2018/1139 is the IAA. The IAA is
185 also designated as the competent authority for Regulation (EU) 376/2014, with responsibility to
186 implement the national mandatory and voluntary occurrence reporting schemes.

187 In effect, as part of the various competent
188 authority roles assigned, the IAA is responsible
189 to oversee that there is a just culture, enabling
190 a mature safety culture leading to an effective
191 safety management system in each
192 organisation.



193 Those organisations required in article 4(2) of
194 376/2014 to establish a mandatory reporting
195 system to facilitate the collection of details of

196 occurrences and a voluntary reporting system as per Article 5(1) are also required, as part of their
197 SMS, to have a safety policy demonstrating management commitment to implementing a safety
198 culture, including a just culture where someone is not blamed for reporting something which would
199 not have been otherwise detected¹⁰. It should be noted that there are some organisations not
200 currently obliged by EU regulation to have an SMS. However, such entities do have related
201 requirements such as a safety and quality policy¹¹.

202 Recognising that 'just culture' is not just a function of the organisation in which the person is
203 working but is also influenced by the way the organisation operates within a State, ICAO and EU
204 regulatory regimes require each State to develop a framework which clearly articulates appropriate

¹⁰ For examples, see Regulation (EU) 965/2012 - ORO.GEN.200(a)(2) and its associated AMC (airlines) or Regulation (EU) 139/2014 – ADR.OR.D.005(b)(2) and its associated AMC (aerodromes).

¹¹ For an example, see Regulation (EU) 1321/2014 – 145.A.65 and its associated AMC

205 safety policies, risk management, safety assurance and safety promotion, enabling an environment
206 in which an effective safety culture can develop.

207

208 State Safety Programme

209 ICAO Annex 19 also requires States to develop a State Safety Programme (SSP), given legal effect in
210 Europe through Regulation (EU) 2018/1139 on common rules in the field of civil aviation. A State
211 Safety Programme is defined by ICAO as simply an integrated set of regulations and activities aimed
212 at improving safety.

213 The concept of ‘just culture’ is already fully
214 embedded in the SSP. Specifically, the
215 enforcement policy detailed in appendix 2
216 states that IAA enforcement decisions will be
217 conducted within a framework of a Just
218 Culture such as James Reason’s decision tree
219 for determining the culpability of unsafe acts.
220 ¹² The SSP is also fully aligned with the broader
221 principles of protection and sharing of
222 information outlined in the Occurrence
223 Reporting Regulation (EU) 376/2014.

224 Ireland’s current SSP is documented and
225 available on the IAA website at:
226 [https://www.iaa.ie/safety/state-safety-](https://www.iaa.ie/safety/state-safety-programme)
227 [programme](https://www.iaa.ie/safety/state-safety-programme). Future revisions will make specific
228 reference to the IAA role as ‘just culture body’.

229 The State Plan for Aviation Safety, also available on the IAA website above, contains specific tasks for
230 the ongoing improvement of safety culture within Ireland, including ‘just culture’ principles.

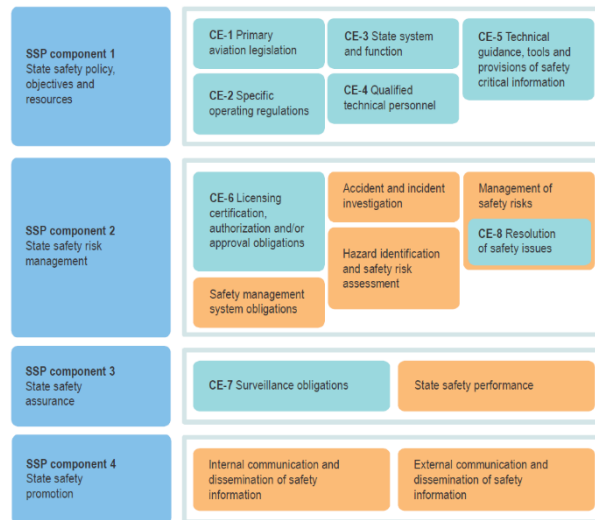


Figure 1: Components of a State Safety Programme

¹² Reason, J; Managing the Risks of Organisational Accidents (p209, 1997, Ashgate Publications).

231 Chapter II: Key Processes

232 As defined in Regulation (EU) 376/2014, the IAA's role as Just Culture Body is to ensure:

- 233 • there is refrain from instituting proceedings in respect of unpremeditated or inadvertent
234 infringements of the law (Article 16.6) which come to their attention only because they
235 have been reported pursuant to Articles 4 and 5;
- 236 • that an employer or an organisation for which the services are provided do not subject any
237 personnel to any prejudice on the basis of the information supplied by the reporter (Article
238 16.9); and
- 239 • that each organisation, after consulting its staff representatives, adopt internal rules
240 describing how 'just culture' principles, in particular the principle of non-prejudice, are
241 guaranteed and implemented within that organisation (Article 16.11).

242

243 1. Refrain from instituting proceedings in respect of unpremeditated or inadvertent 244 infringements of the law (Article 16.6)

245

246 The IAA has published a detailed enforcement policy, as part of its State Safety Programme, clearly
247 articulating how the IAA will refrain from instituting proceedings in respect of unpremeditated or
248 inadvertent infringements.

249 In practice, the IAA's Safety Regulation Division (IAA SRD) procedures for initiating infringement
250 proceedings are developed and managed by the IAA JCB personnel, ensuring the application of just
251 culture principles prior to any decision to institute proceedings.

252 The IAA, will, in accordance with Article 16.13, send the Commission a report on the protection of
253 information sources and in particular on the activities of the just culture body. The report shall not
254 contain any personal data.

255

256 2. An Employer or an Organisation for which the services are provided have not 257 subjected any personnel to any prejudice on the basis of the information supplied by 258 the reporter (Article 16.9)

259

260 If any person believes they have been subject to prejudice as a result of information supplied in an
261 occurrence report, the person may report the action of their employer or the organisation to the IAA
262 as the responsible Just Culture Body (IAA JCB).

263 The IAA will make available a specifically dedicated just culture reporting form and contact details on
264 its website under the existing safety reporting section (<https://www.iaa.ie/safety/safety-reporting>).
265 Any just culture report submitted will be given the same confidentiality and protections as outlined
266 for a voluntary report submitted as per Article 5 of Regulation 376/2014.

267 Upon receipt of a report, the IAA JCB responsible manager will establish a review group, consisting
268 of suitably qualified IAA personnel and if considered necessary, external experts specifically retained
269 for the purpose of providing independent expertise to the just culture body. The review group will
270 act independently in determining if an organisation did prejudice a person on the basis of

271 information contained in an occurrence report. The analysis shall focus on determining whether the
272 various provisions in Article 16 of the Regulation have been complied with, namely:

- 273 a) Article 16.2: occurrence data was only shared with staff involved in investigating aviation
274 safety events and only disidentified information was disseminated within the organisation.
- 275 b) Article 16.3: No personal details were recorded on the occurrence report submitted to the
276 competent authority.
- 277 c) Article 16.7: Information contained in occurrence reports were not used against the
278 reporters, or identified individuals in the report, in any internal disciplinary or administrative
279 proceeding.
- 280 d) Article 16.10: there is no determination of wilful misconduct or a manifest, severe and
281 serious disregard of an obvious risk and profound failure of professional responsibility.
- 282 e) Article 16.11: the internal rules describing how 'just culture' principles are guaranteed and
283 implemented were adhered to.

284 The outcome of the analysis will be a finding that states, in the opinion of the IAA JCB:

- 285 • the organisation has subjected a person to prejudice,
- 286 • there was insufficient information available to make a determination, or
- 287 • the organisation did not subject a person to prejudice.

288 In the case where it is the IAA JCB's opinion that the organisation did prejudice a person, the IAA JCB
289 responsible manager will advise the appropriate IAA inspectorate who will determine the most
290 appropriate enforcement action, taking account of previous oversight audit findings and the SMS
291 maturity as applicable. The inspectorate will manage any related non-compliance issues as part of
292 the oversight programme for the organisation and escalate as necessary as per the IAA Enforcement
293 Policy.

294 As stated in the IAA Enforcement Policy, breaches of aviation regulations may occur for many
295 different reasons, from a genuine misunderstanding of the regulations, to blatant disregard for
296 aviation safety. The IAA SRD has a range of enforcement actions it may use; these actions include
297 non-punitive and punitive actions as follows:

- 298 • discussion with the certificate/licence holder to outline the issues and to agree a resolution
299 of the safety concern;
- 300 • written requirement from the IAA SRD to the certificate/licence holder to resolve the matter
301 within a specified time period;
- 302 • variation, suspension and revocation of authorisations, certificates or licences.
- 303 • summary prosecution (criminal) through the District Circuit Court
- 304 • instigation of indictment proceedings through the Office of the Director of Public
305 Prosecutions (DPP).

306 The IAA SRD will apply this same policy and enforcement actions for the findings of the IAA JCB.

307 The person who lodged the report will be advised on the final outcome of the analysis. The IAA JCB
308 will endeavour to provide a summary of its conclusion. However, it must itself abide by the
309 requirements of article 15 and 16 of the Regulation on confidentiality and appropriate use of
310 information; and protection of information sources respectively.

311 The process flow for a 'just culture' report is provided in figure 2.

312

Initial Conditions Include:
 a) Basic information requested on form supplied
 b) Details of original occurrence report
 c) Organisation concerned is certified by IAA or has its principle place of business in Ireland

A JCB Review Group will be established comprising, as a minimum, three persons (internal or external experts from technical domains, SMS, HF, legal or other expertise as deemed necessary) acting independently.

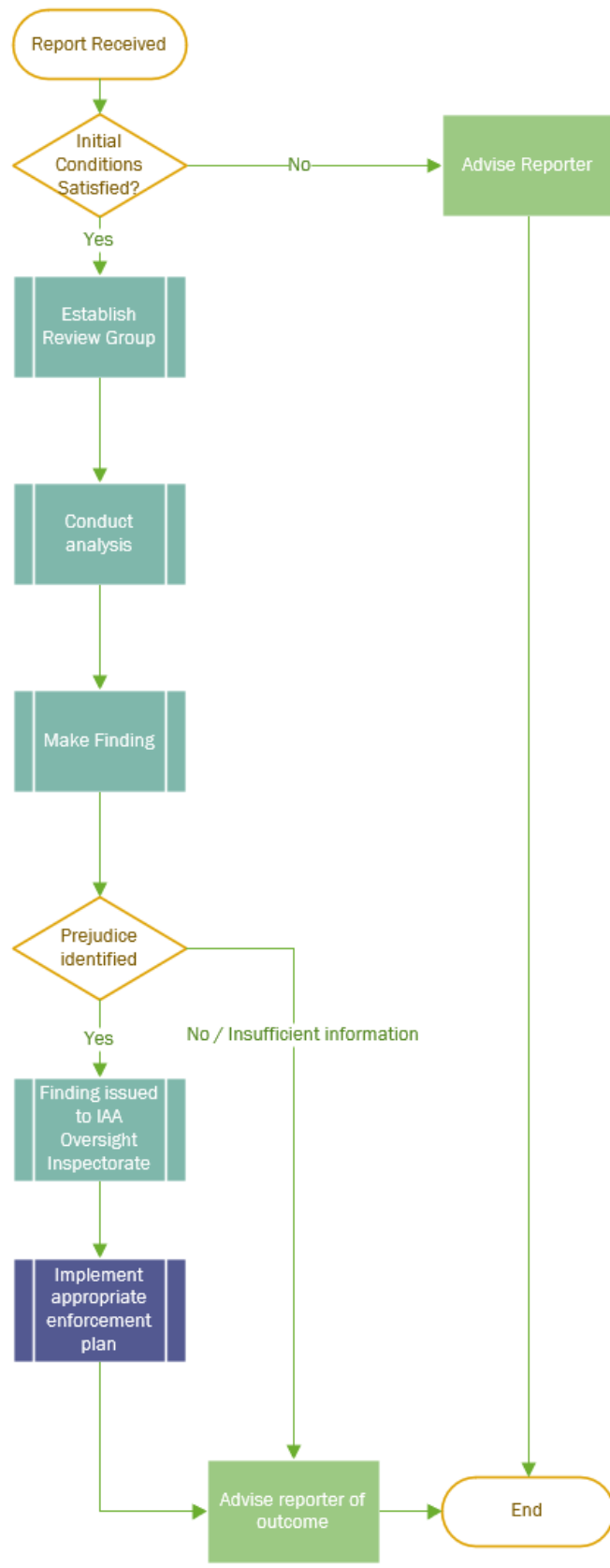
The analysis phase may include an interview with the reporter to clarify and gather additional information. The IAA JCB will ensure the confidentiality of a reporter unless agreed otherwise with them, recognising that this may limit the ability of the analysis to seek certain data from the organisation involved.

The outcome of the analysis will be based on compliance with the provisions of Article 16. Outcomes will indicate, in the opinion of the JCB, either: a) organisation did prejudice; b) there was insufficient information; or c) no evidence of prejudice

The JCB Review Group will advise the relevant IAA oversight inspectorate of its independent finding. The inspectorate will determine the most appropriate enforcement action, taking account of previous oversight audit findings and the SMS maturity as applicable.

The inspectorate will manage the conclusion of the non-compliances as part of the oversight programme for the organisation and escalate as necessary as per the IAA Enforcement Policy.

The JCB will advise the reporter the outcome of the examination, subject to the limitations of protection, confidentiality and appropriate use of information contained in Regulation (EU) 376 of 2014



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Figure 2: Process Flow for Voluntary 'Jut Culture' Occurrence Reports related to Article 16.9

316 3. Implementation of 'just culture' principles in organisations (Article 16.11)

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318 The IAA JCB will coordinate with the relevant IAA SRD inspectorate that holds responsibility for the
319 continuing oversight to ensure implementation of Article 16.11, i.e. 'each organisation established in
320 a Member State shall, after consulting its staff representatives, adopt internal rules describing how
321 'just culture' principles, in particular the principle referred to in paragraph 9, are guaranteed and
322 implemented within that organisation'.

323 As part of the ongoing oversight programmes of certified organisations, the IAA is utilising the EASA
324 Management System Assessment Tool¹³ (MSAT) which specifically addresses the requirements of
325 Regulation (EU) 376/2014 article 16 as shown in figure 4 below.

326 The MSAT seeks to define the management systems of the organisations under four definitions:

- 327
- 328 • **Present:** There is evidence that the feature is documented within the organisation's
Management system/SMS Documentation.
 - 329 • **Suitable:** The feature is suitable based on the size, nature, complexity of the organisation
330 and the inherent risk in the activity.
 - 331 • **Operating:** There is evidence that the feature is in use and an output is being produced.
 - 332 • **Effective:** There is evidence that the feature is achieving the desired outcome and has a
333 positive safety impact.

334 Expanding on the 'what to look for' material provided in the MSAT, the JCB will be specifically
335 looking to identify:

- 336
- 337 a) there is a corporate policy, company process that interfaces with HR, clear procedures
available to all staff;
 - 338 b) everyone is trained, there is a consistent understanding of just culture, and interviewees are
339 able to distinguish between acceptable and unacceptable behaviour;
 - 340 c) there is evidence of structured investigations that are focussed on the behaviours of
341 humans, with evidence of smart interventions; and
 - 342 d) just culture is openly promoted by all employees, is seen as a prime enabler to open
343 reporting and crosses departmental boundaries.

344

¹³ EASA SMAT is available on the EASA website at: <https://www.easa.europa.eu/document-library/general-publications/management-system-assessment-tool>



Annex 19 reference & text

1.1.5 The safety policy shall

d) clearly indicate which types of behaviors are unacceptable related to the service provider’s aviation activities and include the circumstances under which disciplinary action would not apply.

See also Reg. (EU) 376/2014 Article 16.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
A Just Culture Policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours to promote a Just Culture.		There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff.	The Just Culture policy is applied in a fair and consistent manner and people trust the policy. There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff and staff representatives.	
What to look for				
<ul style="list-style-type: none"> • Evidence of when the just culture principles have been applied following an event. • Evidence of interventions from safety investigations addressing organisational issues rather than focusing only on the individual. • Review how the organisation is monitoring reporting rates. • The number of aviation safety reports appropriate to the activities. • Safety Reports include the reporter’s own errors and events they are involved in (events where no one was watching). • Feedback on just culture from staff safety culture surveys. • Interview staff representatives to confirm that they agree with just culture policy and principles. • Talk to staff to check they are aware of the just culture policy and principles. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 376/2014 Article 16(11) AMC1 ORO.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) AMC1 ORA.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) ADR.OR.D. 005 ‘Management system’ AMC1 ADR.OR. D.005(b)(2) ‘Management system’ point (b)(3)	Reg. 376/2014 Article 16(11) ATS.OR.200 ‘Safety management system’ (1)(i) AMC1 ATS.OR.200(1) (i) ‘Safety management system’ SAFETY POLICY – [complex ATS providers] ATM/ANS.OR.A.065	Reg. 376/2014 Article 16(11) AMC1 ATCO.OR.C.001(b) ‘Management system of training organisations’

345

346 *Figure 3: Excerpt from EASA Management System Assessment Tool*

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348 Appendix: Examples of Just Culture Body in other States

349

350 Implementation of Just Culture Body in other States:

351

352 French Just Culture Body: [https://www.ecologique-solidaire.gouv.fr/observatoire-culture-juste-](https://www.ecologique-solidaire.gouv.fr/observatoire-culture-juste-laviation-civile)
353 [laviation-civile](https://www.ecologique-solidaire.gouv.fr/observatoire-culture-juste-laviation-civile)

354 UK CAA: <https://www.caa.co.uk/Our-work/Make-a-report-or-complaint/CAA-whistleblowing-policy/>

355 FOCA Switzerland: [https://www.uvek.admin.ch/uvek/en/home/detec/organisation/specialised-](https://www.uvek.admin.ch/uvek/en/home/detec/organisation/specialised-agencies/reporting-office-just-culture-civil-aviation.html)
356 [agencies/reporting-office-just-culture-civil-aviation.html](https://www.uvek.admin.ch/uvek/en/home/detec/organisation/specialised-agencies/reporting-office-just-culture-civil-aviation.html)

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