



Just Culture Procedure Manual

Airline & EASA SMS Compliance Framework

This manual establishes the foundational principles, procedures, and governance framework for implementing a robust Just Culture within an EASA-compliant Safety Management System. Designed for all operational personnel from the flight deck to the apron, this document balances individual accountability with organizational learning — ensuring safety is not only a policy, but a lived culture.

Section 1: Purpose and Scope

This Just Culture Procedure Manual has been developed to serve as the central governance document within the airline's Safety Management System (SMS), establishing Just Culture not merely as a policy aspiration but as an operational cornerstone embedded in daily practice. The manual provides the structured framework through which the organization balances genuine accountability for individual conduct with the imperative to learn from errors, near-misses, and systemic weaknesses before they manifest as accidents.

The core philosophy underpinning this document is that the overwhelming majority of aviation incidents arise not from malicious intent or deliberate recklessness, but from human error within complex sociotechnical systems. By creating an environment in which personnel feel psychologically safe to report honestly, the organization transforms every incident report into a learning opportunity — a direct investment in operational safety for crews, passengers, and the wider public.

The procedures herein apply universally across all organizational functions, including but not limited to: flight deck and cabin crew operations, aircraft maintenance and engineering, ground handling and ramp operations, air traffic coordination interfaces, and all management and administrative functions with safety-relevant responsibilities. No role is exempt from participation in the Just Culture framework, nor from the obligations of accurate and timely reporting.

This manual supersedes all previous versions of the organization's safety culture guidance documents and must be reviewed annually, or sooner in response to significant regulatory changes, accident investigations, or operational restructuring that materially affects the scope of application.

Scope at a Glance

- Cornerstone document of the EASA SMS framework
- Balances accountability with organizational learning
- Applies to all flight deck and cabin crew
- Covers maintenance, engineering, and ramp
- Includes management and administrative roles
- Annual review cycle mandated
- Supersedes all prior safety culture documents

Section 2: Definitions and Core Principles

Understanding Just Culture begins with precise terminology. The distinctions between categories of human behavior are not academic — they form the basis upon which every investigation, every review panel decision, and every corrective action is founded. Imprecise language leads to inconsistent application, which in turn erodes the trust that Just Culture depends on to function effectively.

Honest Error

An unintentional deviation from expected behavior arising from cognitive limitations, environmental conditions, or procedural ambiguity. No disciplinary action is warranted; corrective learning is the appropriate response.

At-Risk Behavior

A behavioral choice made without recognizing the associated risk, or where the risk is mistakenly believed to be minor or justified. Requires coaching, training, and system redesign rather than punishment.

Reckless Conduct

A conscious disregard for a known and substantial risk. This category warrants formal disciplinary intervention commensurate with the severity of the deviation and harm caused or risked.

Just Culture is not, and must never be mischaracterized as, a blanket amnesty program. It is an atmosphere of trust, built on the understanding that individuals will be held accountable for their choices while simultaneously being protected from punitive consequences for honest mistakes. The organization explicitly rejects the model of individual blame as the primary tool for managing safety. Instead, a system-focused analytical approach is adopted: when errors occur, the investigation first asks "what conditions enabled this failure?" before asking "who failed?"

Just Culture is not the absence of accountability — it is accountability applied fairly, consistently, and with full understanding of the human factors that shape behavior in complex operational environments.

Section 3: Regulatory Alignment (EASA Part-SMS)

This manual has been constructed in direct alignment with the regulatory requirements set forth by the European Union Aviation Safety Agency (EASA) under Commission Implementing Regulation (EU) 2017/373 and the overarching SMS framework defined in EASA Part-SMS. Compliance is not optional — it is a prerequisite for operational certification and the maintenance of the organization's Air Operator Certificate (AOC).

ORO.GEN.200 — Management System

All Just Culture procedures map directly to the requirements under ORO.GEN.200, which mandates the establishment of a management system that includes a safety policy, clearly defined responsibilities, hazard identification and risk assessment procedures, and continuous improvement mechanisms. This manual fulfills the safety culture and reporting obligations within that framework.

EU Regulation 376/2014

Mandatory and voluntary occurrence reporting obligations are addressed throughout this manual in compliance with Regulation (EU) No 376/2014 on the reporting, analysis, and follow-up of occurrences in civil aviation. This regulation provides the legal basis for confidentiality protections and the prohibition on using safety reports as evidence in disciplinary proceedings, except in cases of gross negligence.

Key Regulatory Cross-References

ORO.GEN.200(a)(3)

Hazard identification, risk assessment, and mitigation

ORO.GEN.200(a)(6)

Emergency response planning integrated with SMS

AMC1 ORO.GEN.200

Acceptable means of compliance for safety culture implementation

EU 376/2014 Art. 16

Protection of safety information sources

Section 4: The Safety Policy and Management Commitment

"This organization is unequivocally committed to fostering a Just Culture in which every employee can report safety concerns, errors, and hazards without fear of unjust punishment. Safety is our first and non-negotiable priority." — Accountable Manager

The Safety Policy is the highest-level expression of the organization's commitment to Just Culture and serves as the foundational document upon which all subsequent SMS procedures are built. It is personally signed by the Accountable Manager (AM) and publicly displayed across all operational stations, crew rooms, and training facilities. The policy is reviewed annually as a minimum and re-signed following any change in the identity of the Accountable Manager to ensure continuity of commitment.



Non-Punitive Reporting Commitment

The organization commits unconditionally to protecting employees who report honest mistakes, near-misses, and safety concerns from disciplinary action. This protection is embedded in employment contracts and reinforced through regular leadership communication.



Resource Allocation Mandate

Senior leadership is mandated to allocate sufficient financial, human, and technological resources to maintain and continuously improve the SMS, including the Just Culture mechanisms, investigation capabilities, and training infrastructure.



Senior Leadership Engagement

All members of the senior leadership team are required to actively participate in safety culture promotion, including attending ERG reviews, participating in safety stand-downs, and modeling open communication behaviors.

Section 5: Roles and Responsibilities

The effective implementation of Just Culture requires clearly defined roles at every level of the organization. Ambiguity in responsibility creates gaps in the system that inevitably lead to inconsistent application of policy, eroding trust. The following structure ensures end-to-end coverage of Just Culture obligations across all organizational tiers.

1

Accountable Manager (AM)

Bears ultimate responsibility for the integrity of the safety culture. Signs and owns the Safety Policy. Ensures sufficient organizational resources are allocated to SMS functions. Acts as the final escalation point for Just Culture decisions involving senior personnel. Reports directly to the Board on safety culture performance.

2

Safety Manager (SM)

Manages the day-to-day operation of the SMS, including oversight of the reporting system, coordination of Event Review Group meetings, and maintenance of safety investigation records. Acts as the subject matter expert on Just Culture application and provides guidance to management on correct process adherence.

3

Department Heads & Supervisors

Responsible for creating a psychologically safe environment within their teams. Must never discourage or penalize reporting. Are obligated to escalate reports to the Safety Department promptly and to participate constructively in safety investigations when called upon.

4

Front-Line Operational Personnel

Bear the primary duty to report hazards, errors, and near-misses promptly and accurately. Participate in safety reviews and investigations as required. Provide feedback on the usability and effectiveness of reporting systems as part of the continuous improvement cycle.

Section 6: The Just Culture Policy Statement

The Just Culture Policy Statement is a standalone document, derived from and subordinate to the Safety Policy, that provides operational detail on the organization's tolerance boundaries, reporting protections, and the principles that guide behavioral assessment. It is distributed to all personnel upon joining the organization and is reviewed during every recurrent safety training cycle.

Tolerance Levels and Behavioral Boundaries

The policy communicates, in unambiguous language, that honest errors made by qualified personnel acting in good faith and within the scope of their training will not attract disciplinary sanction. The organization's tolerance extends to at-risk behaviors when those behaviors result from systemic inadequacies — poor procedures, inadequate training resources, or unclear guidance — rather than personal choice to bypass known controls.

Gross negligence and willful violations of safety-critical rules and procedures are explicitly excluded from Just Culture protections. The policy statement defines gross negligence as a conscious and unjustifiable departure from accepted standards of care that a reasonable, competent professional would recognize as unacceptably dangerous. Willful violations — deliberate non-compliance with mandatory requirements — will be subject to the full scope of the disciplinary procedure, including, where appropriate, referral to regulatory authorities.

Confidentiality as a Primary Tenant

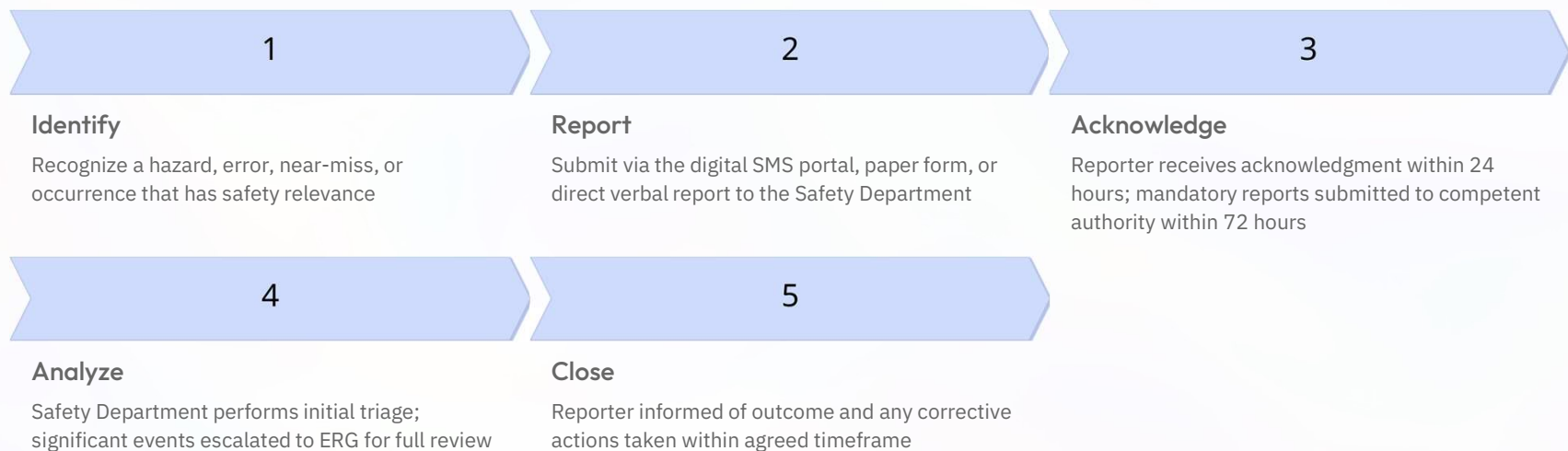
The identity of reporters is protected as a primary tenant of the policy. All reports entered into the safety reporting system are de-identified before analysis. The Safety Manager is the sole custodian of reporter identity information, which is stored separately from the investigation record and may not be disclosed without the explicit written consent of the reporter, except where required by law.

Policy Boundaries Summary

- **Protected:** Honest errors in good faith
- **Protected:** At-risk behavior from systemic failures
- **Not Protected:** Gross negligence
- **Not Protected:** Willful violations of mandatory rules
- **Not Protected:** Criminal acts
- **Always Protected:** Reporter identity and confidentiality
- **Always Protected:** Safety data from misuse

Section 7: Voluntary and Mandatory Reporting Procedures

The reporting system is the central nervous system of the Just Culture framework. Without high-quality, timely, and honest reporting, the SMS cannot fulfill its function of identifying and mitigating hazards before they escalate. This section defines the procedures for both mandatory occurrence reporting as required under EU 376/2014 and the voluntary safety report scheme that captures the broader universe of safety-relevant information.



Access to the reporting system must be frictionless. The organization maintains multiple reporting channels — a primary digital web-based portal accessible from all crew devices and workstations, a secondary paper-based system available at all crew rooms and maintenance offices, and a 24-hour Safety Hotline staffed by trained Safety Department personnel. Anonymous reporting is accepted for all voluntary reports, recognizing that some personnel may not feel comfortable self-identifying even within a Just Culture environment. However, anonymous reports cannot be investigated to the same depth, and reporters are encouraged to use identified reporting channels wherever possible.

Section 8: The Event Review Group (ERG) Composition

The Event Review Group is the cornerstone decision-making body within the Just Culture process. Its composition, independence, and operating procedures directly determine whether the organization's behavioral assessments are perceived as fair and consistent by the workforce. A poorly composed or improperly governed ERG will destroy trust in the system, regardless of how well other elements of the framework function.

Safety Manager (Chair)

Chairs all ERG meetings, maintains procedural compliance, and ensures the investigation methodology is correctly applied. Does not cast a vote on behavioral categorization but facilitates consensus.

Operational Expert

A qualified peer from the operational domain in which the event occurred (flight crew, maintenance, cabin crew). Provides context on the practical realities of the work environment and peer-level understanding of the behavioral choices made.

Human Factors Specialist

Applies recognized human performance frameworks to contextualize the event. Challenges assumptions of simple cause-and-effect and introduces system-level thinking to the review process.

Legal / HR Representative

Ensures the process adheres to employment law, labor agreements, and regulatory obligations. Advises on the legal implications of proposed corrective actions and protects the organization from procedural vulnerabilities.

- ❑ ERG members must not have direct management authority over the individual whose behavior is under review. Conflicts of interest must be declared and the affected member recused before proceedings begin.

Section 9: Investigation and Analysis Methodology

The quality of a Just Culture process is ultimately determined by the rigor and intellectual honesty of its investigation methodology. This section defines the analytical framework applied to all events reviewed by the ERG, from initial triage through to final behavioral categorization and corrective action recommendation. The methodology draws on internationally recognized human performance models and is reviewed regularly to incorporate advances in safety science.



Context mapping is the foundational phase of every investigation. Investigators must reconstruct a complete and objective picture of the conditions in which the event occurred — the physical environment, the crew's duty history and fatigue state, the clarity of applicable procedures, the adequacy of training received, and the real-time pressures present at the time of the event. Premature attribution of blame before context is fully understood is the most common and most damaging error in safety investigation.

Human factors analysis applies recognized models — including the SHEL model (Software, Hardware, Environment, Liveware) and Reason's Swiss Cheese Model — to identify the latent systemic conditions that aligned to permit the event to occur. The application of these models guards against hindsight bias: the tendency for investigators, with full knowledge of the outcome, to judge a decision as unreasonable when it may have appeared entirely reasonable to the person making it at the time, with the information available to them.

Section 10: Defining Acceptable vs. Unacceptable Behavior

The most sensitive and consequential function of the ERG is drawing the line between behavior that falls within the scope of Just Culture protection and behavior that warrants formal disciplinary action. This determination must be made consistently, transparently, and with full documentation of the reasoning applied. It is this consistency that builds or destroys workforce trust in the system over time.



The Threshold Test

The ERG applies a structured Threshold Test when assessing any event. The test evaluates: (1) Was the individual adequately trained and qualified for the task? (2) Did the individual have access to the tools, information, and resources required to perform safely? (3) Would a peer of similar experience and training, in the same circumstances, have likely made the same decision? (4) Was there a prior pattern of similar behavior by this individual that was not addressed? (5) Was the individual's judgment impaired by factors within or beyond their control?

Where the answers to these questions indicate systemic inadequacy rather than individual failing, the corrective action must address the system. Where the answers indicate a deliberate, unjustifiable departure from known safe practice, proportionate disciplinary action must follow. All determinations must be documented in writing by the ERG, including the reasoning applied and any dissenting views from panel members.

Section 11: Disciplinary Policy and Corrective Action

Just Culture does not eliminate disciplinary processes — it ensures they are applied appropriately and proportionately. The organization maintains a formal disciplinary procedure that operates in parallel with the Just Culture process. The key distinction is that behavioral categorization by the ERG informs but does not replace the disciplinary process: the ERG determines whether the event falls within or outside Just Culture protection; the Human Resources department administers any resulting action.

Non-Punitive Interventions

For events categorized as honest error or at-risk behavior arising from systemic factors, the appropriate response is a non-punitive intervention. These may include: additional targeted training on the specific area of failure; procedural revision or clarification to remove ambiguity; ergonomic or equipment improvements; enhanced supervision during a defined re-qualification period; or a facilitated learning conversation between the individual and their supervisor. The individual's HR record is not annotated with any adverse notation as a result of such interventions.

Formal Disciplinary Actions

Where the ERG determines that conduct falls outside Just Culture protection — gross negligence, willful violation, or reckless disregard — the case is formally referred to the HR disciplinary process. Sanctions may range from a formal written warning through to suspension, demotion, or termination of employment, calibrated to the severity of the conduct and any prior behavioral record. In cases involving potential criminal conduct or violations that require regulatory notification, the Accountable Manager authorizes referral to the appropriate authority.



No disciplinary action may be initiated on the basis of a safety report alone, without a completed ERG review determining that the conduct falls outside Just Culture protection thresholds.

Section 12: Protection of Safety Data

The protection of safety data is among the most legally and operationally sensitive aspects of the Just Culture framework. Regulation (EU) No 376/2014 establishes explicit and binding provisions for the protection of safety information, recognizing that the value of safety data to the aviation system depends entirely on the willingness of individuals to share it — and that willingness is contingent on confidence that the data will be used only for safety improvement purposes.

Data Segregation

All safety reports and investigation records are stored in a dedicated, access-controlled Safety Management System database. Access is restricted to the Safety Department and the Accountable Manager. No safety data may be transferred to HR, legal, or management functions without ERG authorization.

Judicial Interaction Protocols

In the event of a request for safety data by judicial or law enforcement authorities, the Safety Manager is the sole authorized point of contact. No data may be released without legal review. The organization will assert all available legal protections under EU 376/2014 before compliance with any disclosure order.

Legal Support

The organization retains specialist aviation law counsel with expertise in safety data protection. Legal support is available to any employee who faces the risk of personal legal jeopardy arising from a safety report filed in good faith. This support is provided at organizational expense as part of the Just Culture commitment.

Internal data handling procedures require that all investigation documentation is marked with the classification "Safety Information — Protected Under EU 376/2014" and stored with appropriate access logging to create an auditable record of who has accessed which data and when. Any unauthorized access to safety data is treated as a serious breach of the organization's information security and Just Culture policies and investigated accordingly.

Section 13: Education, Training, and Promotion

A Just Culture does not emerge from policy documents alone. It is built, day by day, through education, reinforcement, and the lived experience of personnel who see the principles applied consistently and fairly. The organization's training and promotion strategy for Just Culture is therefore as operationally critical as any technical training program.

01

Initial Induction Training

All new personnel receive a dedicated Just Culture module as part of their organizational induction program. This module covers the definitions of error categories, the reporting process, confidentiality protections, and the role each individual plays in sustaining the safety culture. Attendance is mandatory and competency-assessed.

03

Leadership Development

A separate Just Culture leadership module is delivered to all supervisors and managers, focusing on how to receive and respond to reports from team members, how to conduct non-punitive corrective conversations, and how to model safety culture behaviors that cascade through the team.

02

Recurrent Safety Training

Just Culture principles are revisited during annual recurrent safety training for all operational staff. Recurrent training focuses on case study analysis, updates to policy or regulatory requirements, and reinforcement of reporting behaviors. Scenarios are drawn from real organizational events, anonymized, to maximize relevance.

04

Communication Campaigns

Regular internal communication campaigns — posters, safety newsletters, crew-room briefings, and digital communications — normalize safety reporting as a professional expectation and recognize individuals or teams for safety contributions, without compromising confidentiality.

Section 14: Measuring the Safety Culture

What cannot be measured cannot be managed. The organization commits to a rigorous and transparent approach to measuring the health of its safety culture, using both quantitative leading indicators and qualitative cultural assessment tools to build a multidimensional picture of safety culture maturity over time.

Safety Culture Maturity Assessments

A comprehensive Safety Culture Maturity Assessment is conducted every two years, using a validated framework aligned with ICAO and EASA guidance material. The assessment encompasses workforce surveys, structured interviews with personnel at all levels, observation of operational behaviors, and analysis of reporting trends. Results are benchmarked against industry standards where available and tracked longitudinally to identify trajectory.

Periodic Climate Surveys

Between formal maturity assessments, shorter Safety Climate Surveys are deployed annually to all personnel. These surveys measure perceptions of reporting safety, management commitment to Just Culture, the perceived quality and fairness of the ERG process, and confidence in the confidentiality protections. Results are shared transparently with the entire workforce, not merely with management, including areas of weakness and the actions planned to address them.

Leading Indicators Dashboard

The Safety Department maintains a real-time dashboard of safety culture leading indicators, including: voluntary report submission rates; time-to-close on investigation actions; percentage of reports receiving feedback within target timeframe; and ERG decision consistency scores. This dashboard is reviewed at every Safety Review Board meeting.

Key Metrics Tracked

Report Volume

Total voluntary reports per 1,000 operations (rising trend = healthy culture)

Closure Rate

% of reports closed with feedback within 30 days

Survey Scores

Workforce confidence in reporting safety (target: >80%)

ERG Consistency

Variance in behavioral categorization across similar event types

Section 15: Error Reduction and Management Strategies

Just Culture cannot exist as a reactive system alone — its greatest value is realized when the learning derived from investigations and reports is translated into proactive error reduction strategies. This section defines the organization's approach to managing human error at the system level, ensuring that the same errors do not recur because the conditions that produced them have been systematically addressed.



Ergonomic and environmental improvement initiatives are prioritized whenever investigation data reveals a pattern of errors linked to physical workspace design, instrumentation layout, or environmental conditions such as noise, lighting, or thermal comfort. Engineering and operational teams collaborate with human factors specialists to implement evidence-based improvements on a defined timeline with measurable success criteria.

Capturing strategies — those designed to intercept errors after they occur but before they cause harm — are continuously reviewed for effectiveness. These include crew cross-monitoring protocols, maintenance dual-inspection requirements, ATC read-back standards, and automated alerting systems. Where capturing strategies are found to be regularly relied upon to catch errors, this is treated as a signal that avoidance strategies upstream are insufficient and require strengthening.

Tolerance strategies focus on ensuring that when errors do reach the system, the consequences are limited through redundancy, compartmentalization, and resilient system design. The organization's approach to system design explicitly incorporates error tolerance as a design requirement, not an afterthought.

Section 16: Interfacing with External Stakeholders

The organization's Just Culture framework does not operate in isolation. In the interconnected aviation ecosystem, the effectiveness of Just Culture within a single operator depends in part on the alignment of standards, expectations, and protections across the broader network of subcontractors, service providers, regulatory bodies, and partner organizations. This section defines the organization's approach to managing these interfaces.



Subcontractor and Service Provider Alignment

All subcontractors and third-party service providers with safety-relevant interfaces — including ground handling agents, maintenance organizations, catering providers, and fuel suppliers — are required to demonstrate an equivalent Just Culture and safety reporting capability as a condition of contract award. Compliance is verified during supplier qualification audits and monitored through the organization's supplier performance management process. Significant Just Culture failures within the supply chain are escalated to the Accountable Manager and may result in contract review.



National Competent Authority (NCA) Interaction

The organization maintains an open, transparent, and cooperative relationship with its National Competent Authority. Mandatory occurrence reports are submitted within regulatory timeframes. The organization proactively shares safety trend data with the NCA where beneficial to the wider aviation system. Communications with the NCA regarding Just Culture matters are coordinated through the Safety Manager to ensure consistency and regulatory compliance.



Regulatory Audit Readiness

The Safety Department maintains an up-to-date audit readiness package covering all Just Culture procedures, including evidence of ERG activity, investigation records, training completion rates, and survey results. During regulatory oversight visits, the Safety Manager serves as the primary point of contact and ensures that auditors have access to all required documentation while safeguarding protected safety information in accordance with EU 376/2014.

Section 17: Handling Recurrent or Systemic Issues

Individual event analysis, however thorough, can miss patterns that only become visible when a broader dataset is examined. The organization therefore maintains a distinct process for identifying, escalating, and addressing recurrent or systemic safety issues — those which are not attributable to a single individual or event, but which reveal underlying weaknesses in the organization's defenses that require structural intervention.



The Safety Department conducts a formal trend analysis review on a quarterly basis, examining the full body of safety reports and investigation outcomes for recurring themes, event types, or operational contexts that appear with disproportionate frequency. When a pattern is identified — defined as three or more events of similar type within a 12-month rolling period — the Safety Manager initiates a Systemic Review, regardless of whether any individual event was serious enough to trigger a standalone ERG review.

Systemic Reviews apply a deeper analytical methodology than individual event investigations, drawing on defense barrier mapping, bow-tie analysis, and benchmarking against industry-wide safety data where available. The findings are presented to the Accountable Manager and the Safety Review Board with specific, time-bound corrective action recommendations. Progress against these recommendations is tracked on the safety dashboard and reported to the Board quarterly until closure is confirmed.



A rising frequency of similar minor events is often the most reliable early warning indicator of a major accident waiting to happen. The organization treats trend analysis as a strategic safety function, not an administrative exercise.

Section 18: Continuous Improvement of the Process

A Just Culture framework that does not itself evolve will gradually lose alignment with the operational realities of the organization, emerging industry best practices, and the evolving regulatory landscape. The organization's commitment to Just Culture includes a commitment to continuously reviewing and improving the framework itself — treating the SMS as a living system rather than a static document set.

Annual Manual Review Cycle

This manual is subject to a mandatory full review on an annual basis, conducted by the Safety Department in consultation with representatives from all operational departments. The review examines the continued relevance of all procedures, the adequacy of definitions and thresholds in light of actual events experienced during the year, and the alignment of the manual with any updates to EASA regulatory requirements or industry guidance material. The revised manual is submitted to the Accountable Manager for approval and re-signature before reissue.

Reporting System Usability Feedback

The reporting system interface is evaluated annually for usability through a structured feedback process involving front-line personnel from each operational department. Any barriers to reporting — whether technological, linguistic, or procedural — identified through this process are treated as priority items for resolution, recognizing that friction in the reporting process directly suppresses the volume and quality of safety data available to the organization.

Industry Best Practice Integration

The Safety Manager maintains active engagement with industry safety networks, including EASA safety promotion initiatives, IATA safety working groups, Flight Safety Foundation programs, and peer organization benchmarking. Significant advances in safety culture theory or practice identified through these channels are evaluated for applicability and, where appropriate, incorporated into the next annual review cycle.

Workforce Feedback Integration

Personnel at all levels are actively encouraged to submit suggestions for improvement of Just Culture procedures through the standard safety reporting channel. Suggestions are reviewed by the Safety Department and considered during the annual review. Personnel whose suggestions are implemented receive formal acknowledgment, reinforcing the message that the organization values and acts on the input of its people.

Section 19: Managing Transitions and Crisis

Sustaining Just Culture When It Matters Most

Just Culture is easiest to maintain during periods of organizational stability and routine operations. Its true test comes during times of significant pressure — rapid fleet expansion, major restructuring, regulatory crises, loss of key personnel, industrial action, or the aftermath of a serious accident or incident. In these moments, the temptation to abandon the principles of Just Culture in favor of expedient blame attribution or aggressive disciplinary responses is greatest — and the consequences of doing so are most severe and lasting.

High-Pressure Periods

During operational crises, surge periods, or rapid growth phases, the Safety Manager is empowered to escalate the cadence of ERG meetings, increase proactive safety monitoring activities, and issue all-staff Just Culture reaffirmation communications on behalf of the Accountable Manager. Operational tempo does not dilute safety culture obligations.

Organizational Change

During mergers, acquisitions, fleet introductions, or base openings, a formal Just Culture Integration Assessment is conducted to identify gaps between the organization's established culture and that of the incoming workforce, entity, or operation. A targeted integration plan is developed and resourced before operational commencement.

Post-Accident Environment

Following a serious accident or high-profile incident, the Safety Manager activates the Just Culture Crisis Protocol: immediate leadership communication reaffirming the policy, suspension of any informal disciplinary discussions pending ERG review, and appointment of dedicated support for any personnel directly involved in the event.

"Safety culture is not a fair-weather commitment. It is precisely in the moments of greatest pressure that the integrity of Just Culture principles determines whether an organization is truly safe — or merely appears to be." — EASA Safety Management Guidance

Document Control: This manual is issued under the authority of the Accountable Manager. Version controlled. All printed copies are uncontrolled. Always refer to the SMS document management system for the current approved version.