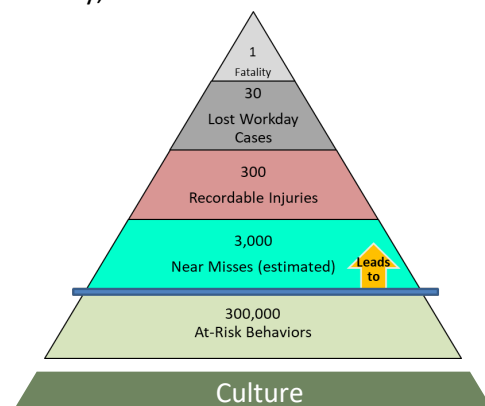


## Managing cultural norms to reduce at-risk behaviors

David Crowner, March 2021

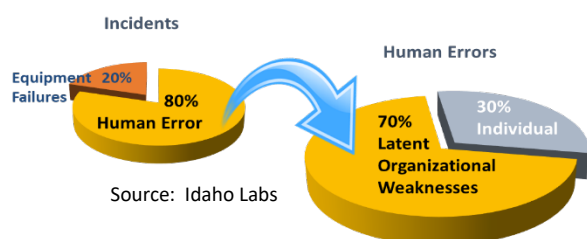
Many of us are familiar with Heinrich’s safety pyramid that shows the relationship of Near Misses and At-Risk Behaviors as precursors to Accidents, Injuries and Fatalities. Significantly, this correlation compels us to be proactive about managing at-risk behaviors to prevent these behaviors from becoming more impactful events – being proactive and addressing issues at the behavior stage prevents escalation to an incident. This also reflects the importance of maintaining robust compliance oversight controls and practices.

At SEA, we track compliance through our enforcement programs, field observations and ongoing audits. Unfortunately, at-risk and non-compliance behaviors are on the rise, indicating an increased potential for more incidents and accidents.



### Why controls and training efforts alone don’t work?

In a 2018 Campbell Institute article, *Serious Injury and Fatality Prevention: Perspectives & Practices*, principle author Joy Inouye, citing several sources, describes the concept of SIF precursors, as high-risk situations where management controls are absent, ineffective, or not complied with, and will result in a serious injury or fatality if allowed to continue. The article identifies three indicators of SIF, the normalization of deviation, an uncalibrated risk perception/tolerance, and decision with safety consequences not grounded in empirical data.



All of these precursors stem from organizational or cultural gaps, supporting the concept that there is a direct correlation between errors/at-risk behavior and latent organizational weaknesses.

### TRAINING ≠ BEHAVIOR CHANGE

In response many managers and leaders implement and impose stronger procedures, controls, and training efforts. However, such efforts, though well intended, are ineffective because these efforts assume that individuals are rational - that if we knew better, we would do better. When in reality our decisions are based on emotions, sensitive to framing and social context.

### How do we reduce at-risk behaviors & improve compliance?

Because our decisions are subject to social context, we need to adopt a Behavioral Based Safety (BBS) approach, where we frame the social context around acceptable behavior and instill a positive safety culture in which there is a personal accountability around safe behavior. Additionally, we must address our own individual latent organizational and cultural gaps.

### BBS + Mgt. of Cultural Precursors = Improved Safety Culture

To support cultural change, SEA has initiated a multi-year effort to engage our community in a Behavior Based Safety initiative to instill a “want to be safe” mindset and stimulate personal accountability for safety. Via a series of collaborative cultural transformational efforts and leadership commitments, the Port intends to promote behavior change and instill active caring, communication and ownership for behavior



- Instill a positive “want to” attitude towards safety
- Reduce human error and promote safe work behaviors
- Standardize safety culture across SEA with all stakeholders
- Fuel personal commitment/ownership for safety
- Motivate increased safety accountability
- Promote meaningful safety conversations
- Ensure sustainability

*“Safety is not just the absence of injury. Its actively monitoring, adjusting, mitigating and continuously improving our safety culture, so that we go home to what and who we value”*

Finally, SEA is taking a systems approach to safety and to work collaboratively to identify and address latent organizational gaps within each respective organization which are leading to a prevalence of at risk behavior and are the basis of Heinrich’s safety pyramid.



Cultural change requires a united, collaborative and holistic effort and I am confident with our combined efforts and your ongoing support we can proactively change our safety culture and reduce at-risk behaviors.

## Another Quarter, another audit...

When you analyze the incidents here at SEA one thing that stands out quickly is that ground support equipment (GSE) related incidents are a significant part of the total incidents reported in the airfield operating area. This is the main reason the Port of Seattle created our quarterly audits.

Once a quarter we visit five companies and conduct to conduct an audit. We assess their pre-operation



inspection program since performing a walkaround inspection on any vehicle before operating is a great way to notice a failure in your equipment and it gives you an opportunity to ensure it is addressed before it becomes an issue.

We also look at the training that operators receive. A well-trained operator knows their equipment and can take steps to avoid

incidents. We ensure that the company has a way to report hazards and incidents. Hazard reporting is essential to any safety program since it allows organizations to deal with issues before they become incidents. We evaluate the organization's preventive maintenance program and a third party contracted GSE mechanic inspects the condition of a sample of the organization's equipment.



We collect all this data, analyze it and craft a report that we then discuss with the organization being audited to provide them a good picture of their GSE program and suggestions on how to improve.

If you get an email from me asking you to participate on an audit don't worry, we'll try to not to affect your operation and, in the end, you will learn a lot about how effective is your organization's GSE programs.

## What is a Just Safety Culture and why is it important?

A just culture is a system in which employees are not immediately disciplined or removed from an organization simply for having been involved in a safety incident. These actions are only considered following a full investigation of the facts and a true determination of root cause, contributing factors, and culpability. This is important for several reasons:

- Incidents generally occur due to a variety of factors, and many of these factors are related to organizational/systemic gaps rather than individual factors.
- Systemic causes underlying incidents will generally lead to multiple occurrences of any given incident, as they are likely influencing multiple employees in the operation.
- Failure to address these systemic causes will mean that even when an individual employee is removed from the equation, there is likely to be a re-occurrence of the incident with another employee.

Even in instances where employees behave recklessly, there are still very possibly organizational factors involved, such as lax oversight, inadequate training or policies, or other environmental factors. This is not to say that employees should never be held accountable for taking risk or making poor choices, but the truth of the matter is likely more complicated and may need to address deeper concerns in addition to such choices.

Implementing a just culture isn't just the right thing to do to ensure that employees are treated fairly when they make mistakes, it also provides several key benefits to any organization.

## What does a Just Culture do for you?

### **Trust**

When employees know they can report incidents and admit mistakes without risking their job, they are far more likely to do so. The more they see the Just Culture in action, the more comfortable they will be with having open and honest conversations about what is going on in the operation. This is also helpful because the more cases in which employees can see that mistakes are not cause for immediate disciplinary actions, and because the organization will experience more minor incidents than serious incidents, the more opportunities are available to build trust.

In addition to safety incidents, employees may feel more comfortable generally sharing other concerns as well, such as operational issues or just general hazards. This allows for even more collaboration which can only benefit the organization and strengthen the culture.

### **Awareness**

When employees report incidents, an organization has a much better picture of where the problems are, as an organization cannot address issues that are unknown. Long term statistical data is also key for identifying trends and an analysis of several similar minor incidents can allow for identification of common root causes which can be addressed before a more serious incident occurs. As previously



mentioned, trust means that employees may bring other issues to the attention of the organization, which can allow for other areas of opportunity to be addressed.

### **Fixing the Root Cause**

By recognizing that incidents are largely caused by a multitude of factors, the solutions can more broadly address these causes. It is not only unethical to simply universally blame employees for accidents and hold them solely and personally accountable for the outcome, it also fails to address the likely contributing factors, and often the true root cause. It may be that training is inadequate, the environment has recently changed, the policies/procedures don't match the actual work, or even that while some employees are not following such policies, a lack of supervision or leadership is allowing this condition to exist. Until the true root cause is addressed, the incident is likely to reoccur.

### **What are some of the challenges of implementing a Just Culture?**

#### **Trust**

Just as gaining trust is one of the advantages of implementing a just culture, maintaining that trust is one of the greatest challenges. Continually promoting the just culture and in particularly successfully implementing just culture in investigations of minor incidents goes a long way to building this trust. There will likely always be some skepticism in pockets of the organization, and ultimately, it will also sometimes be necessary to either discipline employees or terminate employment, particularly in the case of substance abuse or willfully reckless behavior. This is also why it is so important to make just culture visible for minor incidents in addition because it will provide more opportunities to practice implementation and more opportunities to promote the just culture.

#### **Self-Awareness**

It is always challenging for leaders to identify when their decisions may have contributed to an incident. Root cause is frequently a process of finding such errors, and if not addressed they will inevitably lead to more incidents. Recognizing the incentivization set by goals, practical implementation of policies, providing appropriate oversight, ensuring the effectiveness of training and adequate maintenance of equipment are all key to setting employees up for success. Just as employees generally don't come to work intending to be involved in an incident, leaders don't generally intend to create systems which encourage incidents, but everyone makes mistakes. Recognizing where the organization has made mistakes and applying this learning to the Just Culture takes a lot of self-awareness and effort, but it is the only way to truly address systemic issues which may allow for continued incidents if left unaddressed.

### **Where can I learn more about Just Culture?**

All airfield companies should have a Safety Management System implemented, and this will generally explain how just culture is applied within your organization. Further resources are available in various articles from the medical field which was one of the starting places of Just Culture. For leaders, the

culpability model is well worth becoming familiar with because it helps determine levels of responsibility and is very helpful in finding root causes. You can also find quite a bit of reading material from the FAA, ICAO, and other safety focused aviation organizations, and as always, you are welcome to contact your airfield SMS team with any questions.

### Are you ready for Safety Culture Commitment Sessions?

Thank you to those who already participated in the Safety Culture Commitment Workshops. If you or your team would like to find out more about this importance program, please reach out to Alicia Waterton ([waterton.a@portseattle.org](mailto:waterton.a@portseattle.org))



## Safety Culture Commitment Workshops for Leaders



**A COLLABORATIVE APPROACH TO A STRONGER SAFETY CULTURE**

Join us for a transformational workshop to inspire leadership ownership for safety and fuel discretionary effort, improve safety culture, and help prevent serious injuries and fatalities at SEA.

The Port of Seattle is partnering with Propulo Consulting to deliver a series of leadership commitment workshops to improve safety culture and performance. These 2-hour sessions are designed to detail safety culture assessment results, increase leaders' ownership for safety, and provide a preview of future safety engagement sessions.



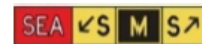
These commitment workshops will help you:

- Better understand current and future safety culture maturity at the Port of Seattle
- Inspire continued leadership support for safety culture improvement
- Develop actions for future improvement both personally and as an organization



Specific topics of the workshop include:

- Discussing and reinforcing current safety culture strengths
- Addressing gaps that hinder optimal performance
- Understanding the need for future improvement efforts
- Interactive exercises to influence personal and organizational change



FOR IMMEDIATE NOTIFICATION, DISTRIBUTION & COMMUNICATION.

Please forward to ALL Airport Staff.

Any questions contact [SMSSpecialist@portseattle.org](mailto:SMSSpecialist@portseattle.org) or call 206.787.SAFE

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