

## **Looking Under the Hood – How EASA Competent Authority Inspectors Can Spot Cultural Shortfalls Fast**

Sofema Aviation Services (SAS) provides a guide for Competent Authorities and Industry alike. Cultural shortfalls aren't always obvious — but with the right questions and a sharp eye, you can find the loose threads and help the organisation start pulling them in the right direction.

### **Introduction**

When you're carrying out an oversight visit, you've only got a short window to figure out whether an organisation's safety culture is the real deal or just a documented set of aspirational guidelines, with little evidence of real engagement.

At Sofema Aviation Services, we know that safety culture is far more than slogans on the wall — it's about what actually happens in the hangar, the ops room, or out on the ramp.

Here we will consider the indicators and signs that will help us to understand the real picture. The objective is to encourage the organisation to lean in, not push back.

### **Superficial Safety Culture – “It's there on paper...”**

Some organisations have safety culture that's spotless on the outside — but that's because it's never been taken out of the packaging. (They have bought a shiny Mercedes but there is no fuel in the tank!)

### **What to look for:**

- The safety policy is framed, laminated, and prominently displayed... but ask three people about its contents and you'll get three different answers (or just as a likely a confession regarding the specific lack of engagement).
- Safety KPIs are reported in management meetings but have no tangible links connecting back to operational decisions.
- Senior leaders do not promote a top down engagement into all aspects of Safety System Behaviour

### **SAS Inspector Tip – Looking for Cultural Red Flags – Ask Random Staff the following or Similar Questions**

- Can you tell me about a safety concern that was raised recently — and what happened with it?
- When did you last hear directly from senior management about safety — and what was the message?

- If you made a mistake on the job, how confident are you that reporting it wouldn't get you into trouble?
- Can you give an example of one safety improvement that's been made here in the last six months?"
- Who would you go to first if you saw a serious safety risk — and why them?"

**Take Away** - If employees can't recall recent safety actions, haven't heard from leadership, hesitate when asked about reporting mistakes, struggle to name tangible improvements, or bypass official channels when raising concerns, it's a clear signal that safety culture isn't connecting — and a powerful opportunity to re-energize trust, visibility, and engagement across the SMS.

### **Considering Organisational Drivers for a Weak Just Culture – “Not Sure Where the Line Is...”**

It's human nature — when people aren't sure what's acceptable and what's not, one of two things typically happen:

1. They keep quiet and avoid raising their hand.
2. They point fingers to protect themselves.

Of course, neither of these behaviours builds trust, and both slowly erode the very foundation of a Just Culture.

- Over time, it creates an environment where learning from mistakes becomes impossible, and the SMS drifts into a “blame or ignore” cycle.

### **Why Weak Just Culture Happens?**

In reality weak Just Culture rarely happens overnight — it's often the result of:

- Inconsistent leadership signals: Different managers apply different rules, creating confusion and mistrust.
- Lack of visible follow-up: Reports go in, but feedback never comes out — so staff stop bothering.
- Policy without presence: The Just Culture statement exists on paper but isn't woven into daily operational life.
- Fear from past experiences: If someone was once disciplined for a genuine mistake, the memory lingers far beyond that single case. (even years later it can still be felt)

### **What to Look For When Lifting the Carpet**

1. Similar incidents handled in completely different ways

- This is a huge red flag. If two engineers make the same human error and one gets a warning while the other gets “don’t do it again,” the rules aren’t the same for everyone.
2. Investigations focusing on *who* made the mistake instead of *why* it happened
    - A Just Culture should dive into causes, context, and contributing factors — not just pin the blame and close the file. If reports read like court transcripts rather than learning documents, you know where the focus lies.
  3. A Just Culture policy that exists... somewhere... but hasn’t been mentioned since the day it was signed
    - Ask random staff when they last heard about Just Culture in a briefing, training, or safety communication. If the answer is “never” or “years ago,” the policy is invisible in practice.

### **SAS Inspector Tip – Spotting Inconsistency in Just Culture Application**

One of the clearest ways to uncover a weak or inconsistent Just Culture is to review how the organisation handles similar events. If you see wildly different corrective actions for almost identical situations, you’re not looking at a robust, standardized process you’re looking at manager-by-manager interpretation.

When that happens, a quick reality-check question can be revealing: “If you made a mistake, what would happen?”

If the answer is “*Depends who’s in charge that day*”, you’ve just found a crack in the cultural foundation.

### **Five Examples of What This Looks Like in Practice**

Same Error, Different Consequences - Two technicians forget to complete a required sign-off. One gets a verbal reminder, the other receives a formal warning in their file.

- No common decision-making framework, leading to fear and uncertainty.

Incident Investigation Styles - One supervisor uses root cause analysis and interviews the whole team; another jumps straight to “who did it” and ends the process.

- The “why” is being bypassed in favour of assigning blame, undermining learning.

Variable Reporting Responses - A flight crew’s fatigue report is addressed with roster changes by one manager, but dismissed by another as “part of the job.”

- Safety concerns are treated as optional rather than systemic issues.

Rule Enforcement Gaps - Two ground handlers breach PPE rules. One is reminded during a team briefing, the other is suspended without pay.

- Cultural Red Flag: Disciplinary action appears to be personality-driven, not policy-driven.

Communication After the Fact - After a maintenance error, one team is briefed on what went wrong and how to prevent it. Another, in a similar case, hears nothing at all.

- Cultural Red Flag: Missed opportunities for organisation-wide learning and reinforcing safety expectations.

## How to Write It Up Cultural Disconnects Without Triggering Defensiveness

Your aim isn't to slap on a label like "Weak Culture" — it's to present clear evidence that leaves no room for debate.

You're showing, not telling. By giving short, sharp examples — even a direct quote or two — you're making the gap real. You're connecting the dots between what's written in the SMS and what's actually happening day-to-day.

That's the key: when people see the disconnect in plain language, they're more likely to own the issue and do something about it.

- **Stick to facts:**  
"Three staff interviewed could not recall management attending a safety meeting in the last 12 months; records confirm no attendance in Jan–Jul 2025."
- **Anchor to the standard:**  
Reference the MSAT maturity levels (e.g., Present → Suitable) so the discussion is linked to a recognised benchmark, not personal opinion.
- **Important Motivator - to Invite the following action:**  
End with "Organisation is invited to review and strengthen..." rather than "Organisation fails to..."