SMS Good Practice Submission			
ANSP	ATNS SOC	Date of submission	14 August 2025
SoE Study Area	SA1.3		
Good Practice title	Just Culture Peer Review Process		
In use since	2018		

Details:
Please provide some details of the good practice – Approx. 500 words. Details should include:

1. *A brief description of the Safety Management process good practice being submitting for review by the Best Practice Review Group.*
2. *A justification of why the Safety Management process is believed to be a "good practice";*
3. *A description of the resources required to develop the Safety Management process, for example: how long did the development take, how many people were involved and whether there a significant technology cost;*
4. *A description of why the Safety Management process was developed (for example: to solve an identified safety problem, improve efficiency or in response to an audit observation etc.);*
5. *A description of how the Safety Management process has improved safety performance, or, the understanding of safety in the organisation.*

While the information provided will be treated in confidence, you may want to indicate if certain aspects should be treated with particular care as they are commercially sensitive, are patents, claimed intellectual property rights or similar.

SA1.3:

- Accompanying the publication of the ATNS Just Culture Policy, was the publication of a Just Culture Peer Review Committee.

- A minimum number to form a quorum is 4 members of which a minimum of 50% of the committee presiding over a case must consist of peers in the form of operational staff. Other members are made up of an operational manager that also attended the peer review training plus a representative from the safety office that acts as the secretariat. In most cases the aim is to have 4 operational staff members attend to a case together with the manager and secretariat. Members are selected based on the type of sectors they work, and the selection is made from a group of twelve controllers and two operational line managers that attended the training.

- The procedure stipulates that a consensus should be reached between the members before a decision or outcome can be concluded. Although the procedure contains a decision tree and some examples, the complex environment of operations remains paramount and necessitates discussion of situational constraints in understanding the context within which the individual operated. The resources involved in developing the procedure included ATS management, human factors specialists, ATS specialists, technical specialists, the Human Capital department (employee relations) and the Legal department.

- The process was developed because there was a recognition that the implementation of the Just Culture needed a framework to guide practical implementation to ensure uniformity in application across the relevant areas.

- Moreover, the appeal process of such a committee finding calls upon an independent 3rd party from the aviation industry (retired airline pilot with just culture experience within IATA & IFALPA) to review any case from the perspective of JC principles and the protection of the corporate reporting culture within the ambit of industry safety.

- More importantly, the compilation of the Peer Review Procedure together with the Just Culture Policy led to the changes in the ATNS Disciplinary Code to replace previous line items that attracted disciplinaries for operational violations towards adopting a peer review approach where colleagues understanding and working the with every day constraints are afforded the opportunity to evaluate the context and determine as a team whether the person was deliberately unsafe. The three constructs that may activate a peer review are: gross negligence, recklessness and sabotage. Should any person in the organisation have a concern regarding the

potential presence of either of these constructs, they may request for a peer review process to be activated.

- The publication of the JC policy, peer review procedure and Disciplinary Code led to a roadshow where all operational staff were exposed to these publications and how this will operate in ATNS. The awareness training was further complemented by a Just Culture booklet that were handed out at each training sessions. The same awareness training also culminated into an invitation for a nomination process where staff could nominate a peer that they would be comfortable with presiding over a case if they would ever be in such a situation. The list of names was ratified by management and then the first peer review training was hosted with a final list of candidates.

- The implementation of the Just Culture Policy and the peer review process has improved safety performance in the sense that reporting has improved, and employees now know with certainty what steps will be taken and how the process will unfold, it has removed fear amongst employees and encouraged reporting.

- Most recently, we believe that the improved scores on the ATNS just culture section of the recent safety culture survey are because of the following reasons:

    i)   The ATS line manager workshops conducted over the past 12 months that provided a forum to discuss the conduct and vocabulary of managers in instilling a just culture;
    ii)   The presence of the peer review procedure and committee;
    iii) The annual corporate safety workshop hosted where just culture remains a topic for discussion between management and staff in an open forum. This event has operational staff from across the country flown in to attend and invite debate around safety.

- The peer review procedure was applied twice in the past 24 months, and the procedure were tested to its full extent with the most recent case because of the multiple angles that had to be considered together with the risk factor wilfully introduced by the controller.

- A refresher course for the peer review committee members were hosted in March 2024. This time around actual examples from ATNS were used for discussion and applied as case studies.

- One of the Safety-Net newsletter also displayed the photos of the team attending the peer review training together with a reminder why the peer review committee exists = improving reporting to improve safety.

By submitting this Good Practice, I confirm that my organisation is willing for the proposed Good Practice to be shared with other ANSPs and to be made available on EUROCONTROL's Skybrary website.

This document should be sent to: soe_2023@eurocontrol.int.