

SMS Good Practice Submission			
ANSP	ATNS SOC	Date of submission	August 2024
SoE Study Area	SA1.3		
Good Practice title	Just Culture Peer Review Process		
In use since	2018		
<p>Details:</p> <p>Please provide some details of the good practice – Approx. 500 words. Details should include:</p> <ol style="list-style-type: none"> <li>1. A brief description of the Safety Management process good practice being submitting for review by the Best Practice Review Group.</li> <li>2. A justification of why the Safety Management process is believed to be a "good practice";</li> <li>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;</li> <li>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.);</li> <li>5. A description of how the Safety Management process has improved safety performance, or, the understanding of safety in the organisation.</li> </ol> <p>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.</p> <p><b>SA1.3:</b></p> <ul style="list-style-type: none"> <li>• Accompanying the publication of the ATNS Just Culture Policy, was the publication of a Just Culture Peer Review Committee (document shared previously and due for review process in ATNS over the next 4 months).</li> <li>• A minimum number to form a quorum is 4 members of which a minimum of 50% of the committee presiding over a case has to consist of peers. Other members are made up of a peer review trained manager and other safety office staff.</li> <li>• 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. This process took 18 months to conclude.</li> <li>• 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.</li> <li>• Moreover, the appeal process of such a committee finding calls upon an independent 3rd party from the aviation industry (retired airline pilot with JC experience within IATA &amp; 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.</li> <li>• 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 errors and violations to adapt a peer review and only activated in cases where gross negligence, reckless or sabotage were identified by the peer review committee.</li> <li>• 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</li> </ul>			

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 really 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.
- The peer review procedure was applied twice in the past 24 months and the procedure and practice were tested to its full extent with the most recent case and the multiple angles of considerations to be taken into account. CANSO has proposed that this test case be queried with the peers of the relevant ATSU to see how they experienced the process and the fairness of the outcome.
- 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 practice as case studies.
- The most recent Safety-Net newsletter also displayed photos of the team attending the peer review training as well as 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](mailto:soe_2023@eurocontrol.int).