



saercosafety

Newsletter n°19 July 2025

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Ready...

The editorial

Promoting Just Culture and Voluntary Reporting

In aviation, human errors are inevitable. What makes the difference is not their absence, but how organizations respond to them.

Operational safety in aviation largely depends on the ability to learn from mistakes, incidents, and latent threats. In this context, just culture has become one of the fundamental pillars of the Safety Management System (SMS) within air traffic service (ATS) providers.

Promoting this culture means shifting from a reactive to a proactive mindset, aiming to learn before an accident occurs. It also involves recognizing that safety is not built solely through procedures, but through the people who apply, interpret, and adapt them daily in a constantly changing environment.

In the field of air navigation, operational safety heavily relies on individuals' willingness to report events, errors, and potential risks. For this to happen, a just culture is essential—an environment in which professionals feel safe to report what happens without fear of unjustified reprisals.

This bulletin is dedicated to reinforcing the importance of promoting a culture of trust, transparency, and continuous learning, in which voluntary reporting becomes a regular and effective tool to prevent accidents, improve procedures, and strengthen our Safety Management System (SMS).

A just culture does not imply the absence of consequences for negligent behavior; rather, it clearly distinguishes between unintentional human errors, unsafe acts, and reckless or malicious conduct. This distinction allows us to:

- Encourage honesty and transparency in reporting.
- Analyze incidents with a system-focused approach, not a person-focused one.
- Learn collectively from mistakes and avoid repeating them.

This type of culture is the foundation of an effective SMS, as it improves both the quality and quantity of reported information and enables proactive risk management.

The importance of voluntary reporting

Voluntary Occurrence Reporting (VOR) is one of the most powerful tools for proactively improving operational safety. Unlike Mandatory Occurrence Reporting (MOR), which focuses on significant incidents as defined by regulations, VOR allows for the documentation of minor events, unsafe conditions, operational deviations, human factors that could lead to more serious incidents, and more.

Voluntary reporting is:



A reflection of SMS maturity: the higher the proportion of voluntary reports, the more mature the organization is in terms of safety culture.



A channel to bring everyday issues to light (issues that would not fall within the scope of MOR).



A valuable source of qualitative data, which complements formal statistics with operational context.

In environments where few events are reported, it does not necessarily mean that there are few risks—it likely indicates a weak reporting culture. Encouraging voluntary reporting also means promoting dialogue between the system and its users. Without these reports, we lose the opportunity to understand how procedures are actually applied (or adapted) in real-life operations.

A vertical photograph of a helicopter on a runway, with a wavy grid pattern overlaid on the right side of the page.

The article

Recommendations to improve reporting

Improving the quality of reports within the Safety Management System (SMS) is essential to ensure a safe and efficient operational environment. To achieve this, all involved personnel must apply a series of good practices to ensure that each report contributes effectively to risk analysis and the implementation of preventive measures. One key recommendation is to submit the report as soon as possible after the event. This ensures that the information is fresh, accurate, and that contributing factors can be identified more clearly. Late or poorly documented reports limit their usefulness to the safety system.

Another essential recommendation is to structure the content of the report clearly and objectively. Vague expressions or personal judgments should be avoided; instead, the facts should be described as they occurred—what happened, when, where, how, and with what potential consequences. Relevant information about the environment and any actions taken to mitigate the situation should also be included.

Reports should also include details that enable thorough analysis. These may include aircraft identifiers, runway or taxiway data involved, affected systems or equipment, personnel involved, and actions taken. The more precise and complete the information, the more valuable it becomes for identifying systemic risks.

It is also crucial to use the official reporting channels established by the organization. Each professional is responsible for knowing and using these channels correctly. A report submitted outside the appropriate channel or without the proper format may not be recorded properly and therefore may go unaddressed.

Applicable regulations

The reporting of occurrences and incidents in the field of air navigation is regulated at the European level by a set of regulations that establish the legal **obligation to report, record, assess, and share operational safety information**. These regulations apply both to air navigation service providers (ANSPs) and to the personnel involved in the provision of such services (ATCOs, AFIS officers, CNS technicians, etc.).

Regulation (UE) N° 376/2014

This is the main regulation concerning occurrence reporting in civil aviation. Its key elements include:

Article 4 – Obligation to report

Specifies that certain individuals and organizations must report occurrences that take place during the performance of their duties and that could endanger civil aviation safety.

Article 5 – Reporting deadline

Reports must be submitted as soon as possible and no later than 72 hours after becoming aware of the occurrence.

Article 15 – Just Culture

Reporting personnel are protected, provided there is no gross negligence or willful misconduct. The aim is to encourage voluntary and open reporting.

Implementing Regulation (UE) 2015/1018

This regulation complements Regulation 376/2014 and defines the list of occurrences that must be mandatorily reported.

Some specific examples applicable to ATS services include:

- o Loss of minimum separation between aircraft
- o Runway incursions
- o Failures in navigation, surveillance, or communication systems
- o Incorrect issuance of clearances
- o ATC/pilot communication misunderstandings
- o Use of incorrect frequencies or radio interference

The annex to this regulation classifies occurrences based on the type of operation (ATM/ANS, aerodromes, aircraft, etc.).

Norma	Contenido clave
Regulation (UE) 376/2014	- o Establishes the legal obligation to report safety occurrences. - o Mandatory reporting within a maximum of 72 hours from awareness. - o Protection of the reporter under the principle of Just Culture. - o Requires ANSPs to implement internal reporting channels.
Implementing Regulation (UE) 2015/1018	- o Provides the exhaustive list of occurrences subject to mandatory reporting. - o Includes events related to loss of separation, communication failures, runway incursions, etc. - o Classifies occurrences by type of operation (ATM/ANS, aircraft, aerodromes).
Regulation (UE) 373/2017	- o Requires ANSPs to implement a Safety Management System (SMS). - o Mandates internal procedures for the identification, analysis, and follow-up of occurrences. - o Requires personnel training and access to internal reporting mechanisms. - o Establishes the requirements subject to State oversight (in Spain, by AESA).
Law 21/2003 on Aviation Safety	- o This law reinforces the general duty to cooperate in the reporting and investigation of incidents. - o It serves as the national legal basis to support the implementation of European regulations. - o It establishes the responsibilities and authority of AESA (the Spanish Aviation Safety and Security Agency) as the supervisory body.
National Occurrence Reporting System (SNS) – managed by AESA	- o AESA acts as the focal point for reporting in Spain. - o It oversees that ANSPs have internal procedures and comply with reporting deadlines.

The statistics: reporting

When analyzing the data for the period from January to May 2025, there has been an increase in the number of notifications recorded. If this trend continues, it is likely that the figures reached in 2023 will be matched or even surpassed. This sustained increase in reports within SAERCO over time is not only related to the rise in operational activity but also to the growing involvement of personnel in identifying and reporting relevant occurrences.

This positive change in organizational culture has led to a notable improvement in incident documentation, ensuring that every event is properly recorded and evaluated.

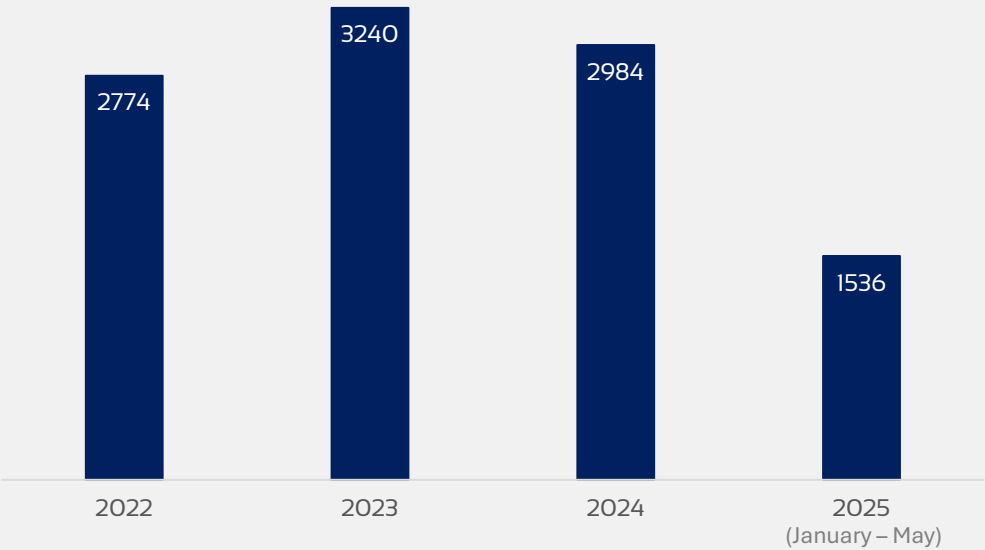
Furthermore, constant monitoring of the time taken to submit reports has confirmed strict compliance with the deadlines required by AESA. All of this highlights SAERCO's continuous effort to strengthen its reporting mechanisms and consolidate a culture oriented towards continuous improvement. The results obtained compared to previous periods demonstrate progress toward a more efficient, transparent, and committed management of operational safety.

“Achieving a notification system where proactivity is the usual practice is not easy; it requires the effort and commitment of the entire organization, especially the operational staff”

MOR: Mandatory Report
VOR: Voluntary Report

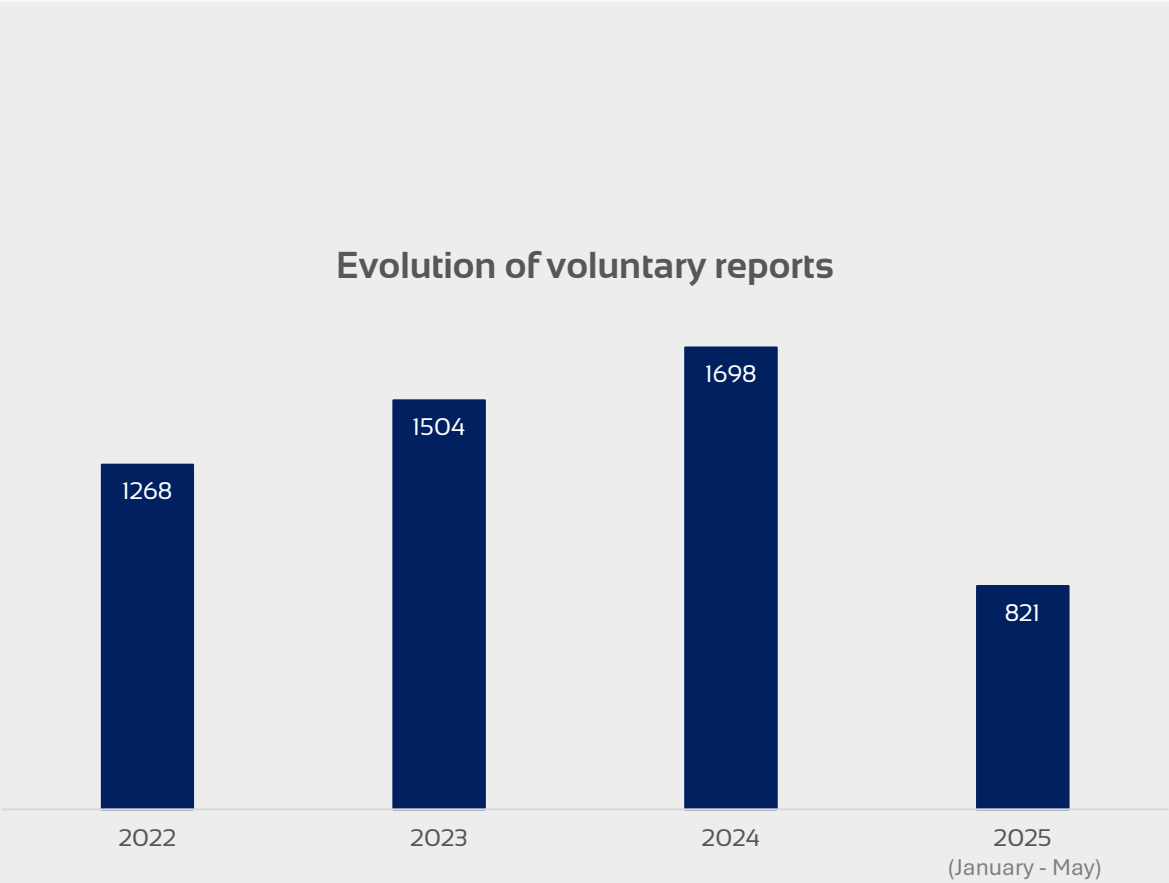
Safety reports ATS SAERCO 2025 (January - May)		
MOR/VOR	Average time to report	Average time to MOR/VOR
1536	2:25:29	27:45:55

Reports evolution ATS 2022 - 2025



The statistics: voluntary reports

The graph shows the evolution of the number of voluntary reports registered by SAERCO between 2022 and 2025 (in the latter case, only up to May).



If the current pace of voluntary reports continues throughout the rest of 2025, it is reasonable to project an annual total that would surpass the figures from 2023 and could even approach the record set in 2024.

This suggests that:

- o The reporting culture continues to strengthen within the organization.
- o There is increased awareness among operational personnel about the importance of voluntarily documenting events.
- o The reporting system is functioning effectively, encouraging active employee participation.

The positive trend in the number of voluntary reports reflects an increasingly proactive environment in terms of operational safety and continuous improvement. If the 2025 trend holds, it will mark another year of strong commitment to safety culture and voluntary reporting within SAERCO.

Lessons learned

A just culture and an effective reporting system are fundamental pillars in preventing accidents in aviation. When professionals report incidents, risks, or unsafe conditions without fear of retaliation, organizations can identify patterns, correct deficiencies, and take proactive measures to avoid tragedies. However, promoting reporting is pointless if the collected information is not translated into concrete actions. A lack of response to repeated warnings can create an environment where errors are repeated until an accident occurs.

A clear example of this failure in safety management was the accident of Flight 5342 in Washington D.C. in 2025.

Collision near Ronald Reagan National Airport, Washington D.C. (2025)

In January 2025, a Bombardier CRJ-700 regional jet operating as American Eagle Flight 5342 collided in mid-air with a military Black Hawk helicopter over the Potomac River, near Ronald Reagan National Airport in Washington D.C., while approaching for landing. The collision caused both aircraft to crash into the water, resulting in the deaths of all 67 people on board.

Preliminary investigation revealed that the helicopter was flying higher than authorized in that restricted area, was not transmitting its position via the ADS-B system, and did not fully comply with air traffic control instructions. Additionally, there was only one controller on duty in the control center at that time. Numerous near-miss alerts had been reported in previous years, but no effective actions were taken. The accident exposed failures in the just culture where vulnerabilities in the airspace near Washington Airport had been correctly reported but not acted upon.



Conclusion

Promoting a just culture and the regular use of voluntary reporting are key to proactive management of operational safety. The increasing involvement of personnel in reporting events reflects a mature organizational environment where continuous learning, transparency, and prevention are prioritized. Only by acting on reported data can future accidents be prevented and the safety management system truly strengthened.

This bulletin highlights the essential role that just culture and voluntary reporting play in enhancing operational safety. A safe organization is not one that never makes mistakes, but one that is capable of learning from them, analyzing them with a systemic approach, and transforming that knowledge into concrete improvements.

In this regard, SAERCO's evolution in recent years is especially remarkable. The increase in the number of voluntary reports reflects growing organizational maturity and improvement in safety culture. The active involvement of operational and technical personnel in identifying and reporting events demonstrates that the reporting system has been established as an effective, agile, and useful tool for all levels of the organization.

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