



European Aviation Safety Agency

Annex C

SSP Phase Implementation Survey Results 2013

Draft

This document provides a summary of the results of the SSP Phase implementation survey completed by 15 States as part of the implementation of the European Aviation Safety Plan (EASp).

SSP Phase Implementation Survey

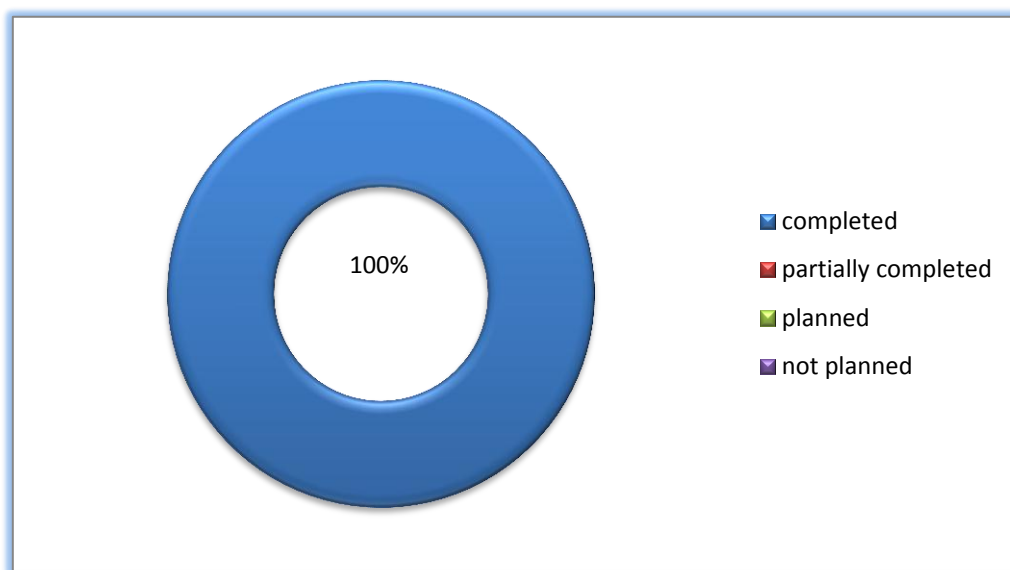
SUMMARY OF RESPONSES

(Based on 15 responses)

PHASE 1

1. SSP element 1.2(i):

a. Identify SSP Place Holder Organisation and Accountable Executive



Summary

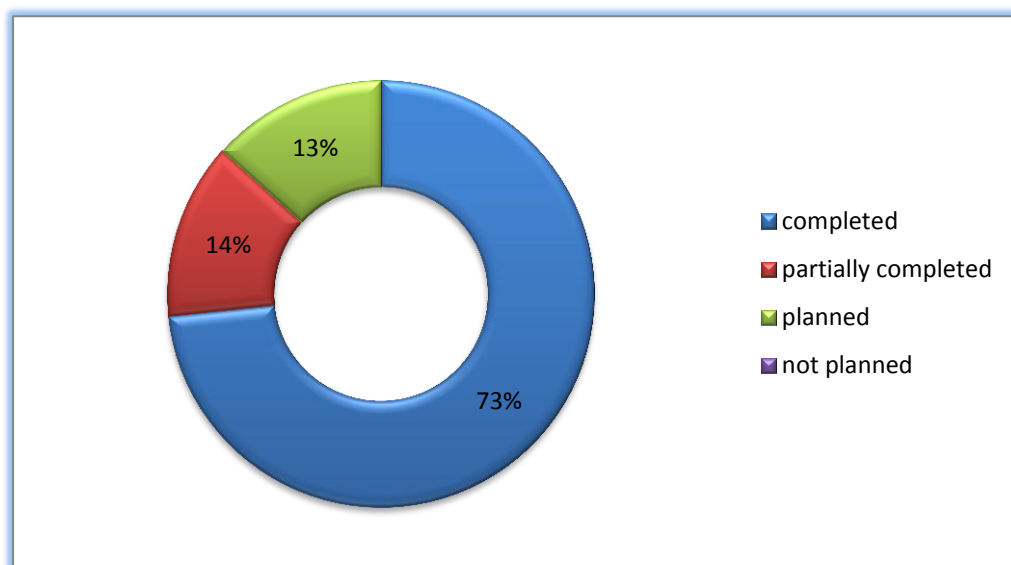
All States (15) that responded to this survey have identified SSP place holder organization and have nominated accountable executive for the SSP implementation process.

Additional Observations

Finland (C): SSP Place Holder Organisation in Finland: Finland's CAA Trafi (Transport Safety Agency) Accountable Executives: Director general Mr Kari Wahlman/Trafi and Director General of Civil Aviation Mr Pekka Henttu/Trafi

Spain (C): Place Holder Organization: AESA Accountable Executive: Identified by a Royal Decree (to be published in October)

Switzerland (C): The FOCA; the DG

b. Establish SSP Implementation Team.**Summary**

11 States have established SSP Implementation Team, two States are in the process of setting up the team and two States plan to do it in the near future.

Additional Observations

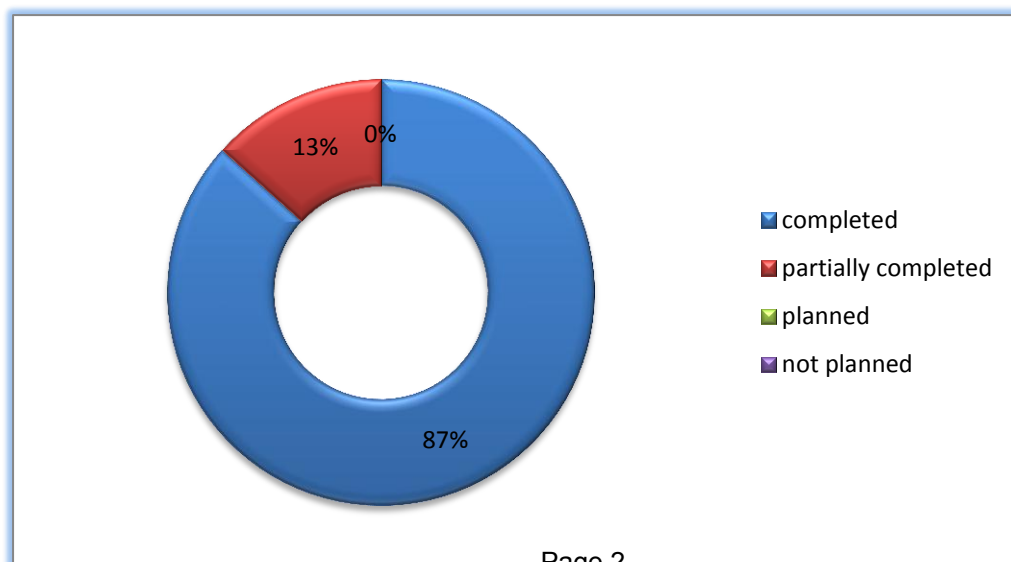
Monaco (C): Due to the size of the Civil Aviation, the particularity is that Monaco CAA is assisted by Bureau Veritas for the SSP. Thus, an external consultant has the role of "SSP manager" and work in close cooperation with the DG of the CAA.

Finland (C): Work is done: First SSP for Finland (FASP, Finnish Aviation Safety Programme) was published 8th April 2012. Second version on 8th April 2013.

Spain (C): SSP implementation team is part of DESATI. DESATI is one of the AESA's Directorate

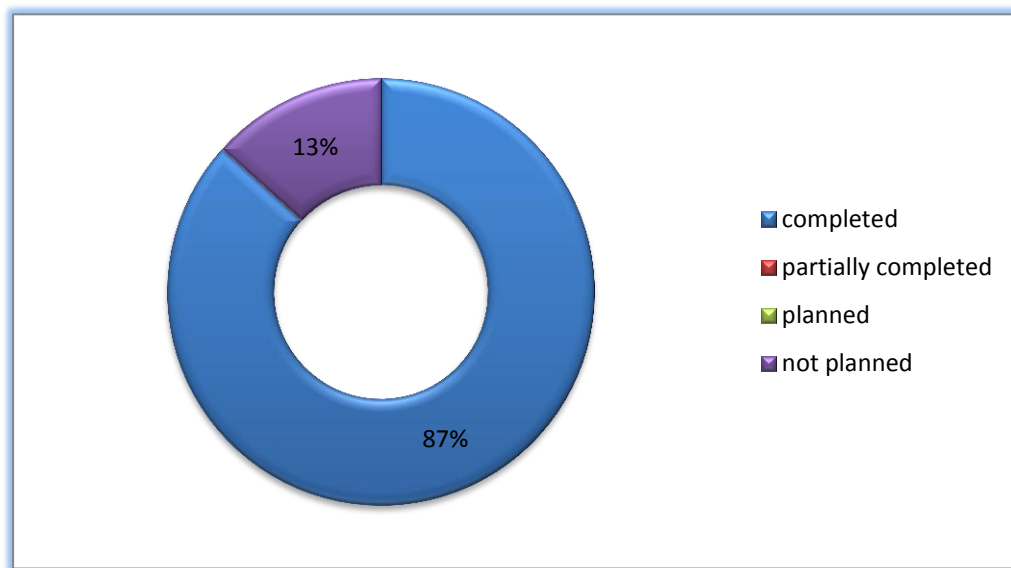
Ireland (C): Further refinement due in 2013.

Switzerland (C): The FOCA Board.

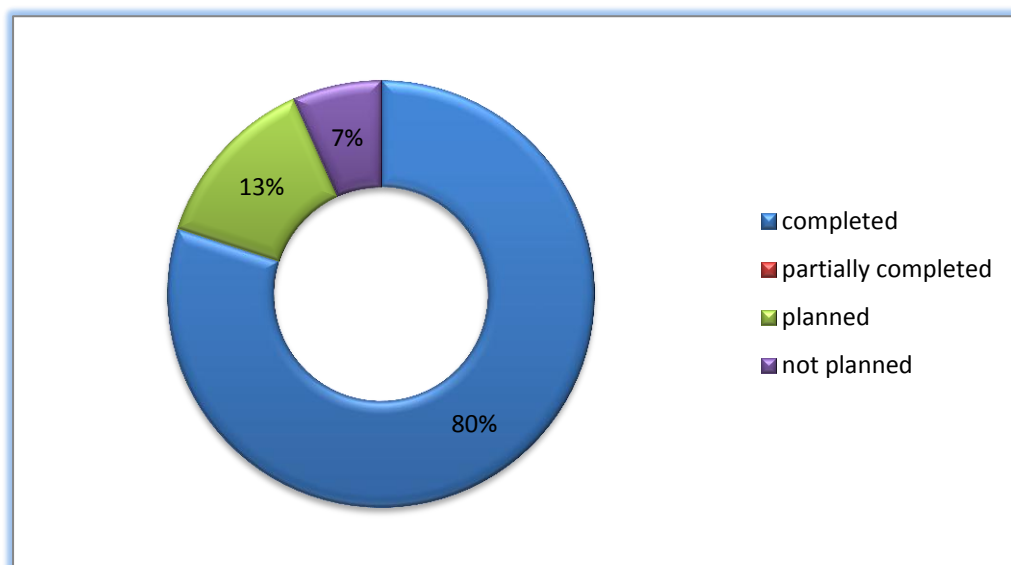
c. Perform SSP Gap Analysis.

Summary
13 of 15 States have completed SSP Gap Analysis.
Additional Observations
Sweden (C): A gap analysis was performed in 2008 when the first SSP was issued. No subsequent gap analyses have been performed.
Ireland (C): Plans to update it in line with Doc SMM Ed 3.
Switzerland (C): Conducted by the SRM Office; approved by the Board.

d. Develop SSP implementation plan



Summary
13 of 15 States have developed SSP implementation plan. Two States (Sweden, Italy) do not plan to implement and follow such plan.
Additional Observations
Monaco (C): Actions for implementation were included in the first State Safety Action Plan. A second version of this action plan is being finalized, to list the last actions for implementation and then the actions for improvement.
Sweden (NP): This work is done by adding tasks to the yearly general business plan of the authority.
Spain (C): Included in the SSP Gap Analysis document
Ireland (C): Update planned for 2013 in line with Annex 19 and SMM Ed 3.
Switzerland (C): Already implemented; plan was a mandate by the Board.

e. Establish SSP coordination mechanism.**Summary**

Twelve States established SSP coordination mechanism, two States plan to do it and one State (Sweden) doesn't plan to establish an SSP coordinating mechanism.

Additional Observations

Monaco (C): Initially we were conducted a yearly meeting, held by the DG, to discuss the results of the oversight perform during the year. The role of this annual meeting has been extended to also discuss the yearly results of the SSP / safety performance. In addition, safety meetings are organized internally, at least 3 times a year.

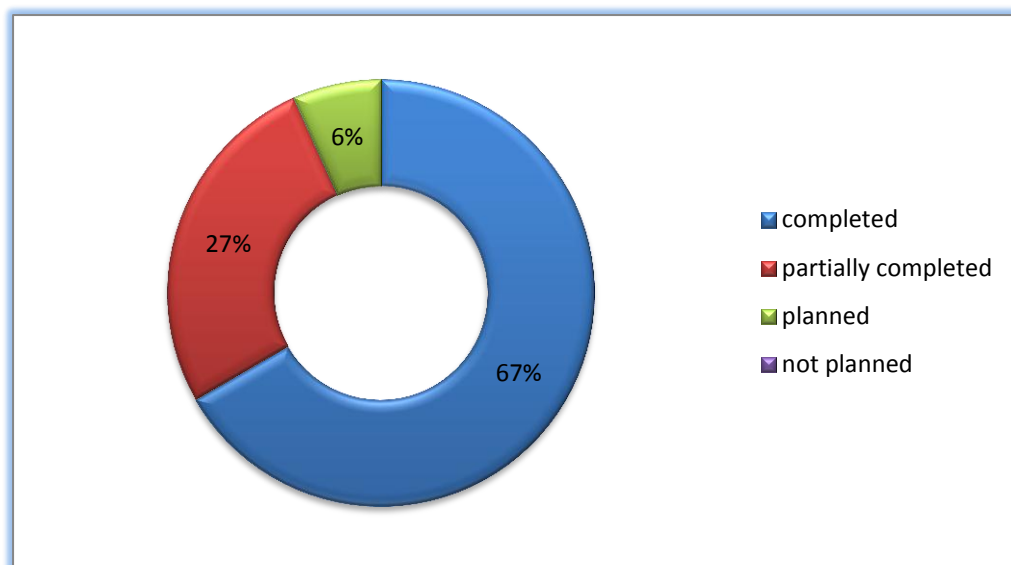
Sweden (NP): We have judged that there is no need to establish an SSP coordinating mechanism.

Spain (C): Included in the SSP Royal Decree (to be published in October).

Italy (C): A "Safety Committee" has been nominated including CAA, Accident Investigation Body, Minister of Transportation, Air Force, ATC provider and National Flying Clubs Association.

Switzerland (C): SRM Office functions as the coordinating body.

f. SSP Documentation including the State's SSP framework, its components and elements.



Summary

Ten (10) States have established SSP Documentation System. Four (4) States are currently working on this and one State plans to establish the documentation system in the near future.

Additional Observations

Monaco (C): 2nd version of the SSP will be published soon.

Finland (C): First SSP for Finland (FASP, Finnish Aviation Safety Programme) was published 8th April 2012. Second version on 8th April 2013 (FASP can be found: www.trafi.fi, also attached to this survey).

Sweden (C): Third revision published June 2013.

Spain (PC): We have a draft version that will be published in an Agreement of the Council of Ministers.

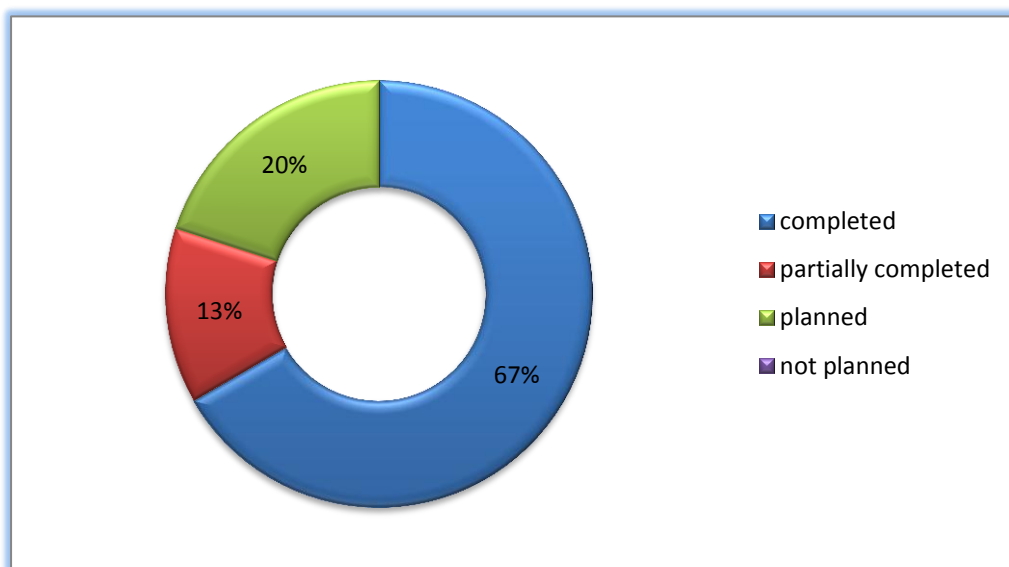
Ireland (C): SSP documentation to be updated in line with Annex 19.

Switzerland (C):

<http://www.bazl.admin.ch/themen/sicherheit/00295/03663/index.html?lang=en>

PHASE 2

1. SSP element 1.1: National aviation legislative framework



Summary

Ten (10) States have promulgated the necessary national aviation legislative framework. Two States (Finland, Spain) haven't finished this task yet and three more States (Portugal, Turkey, Montenegro) are in the planning phase at the moment.

Additional Observations

Monaco (C): SMS requirements are in place. This should be completed by provisions on SSP to be implemented in the primary law, under revision.

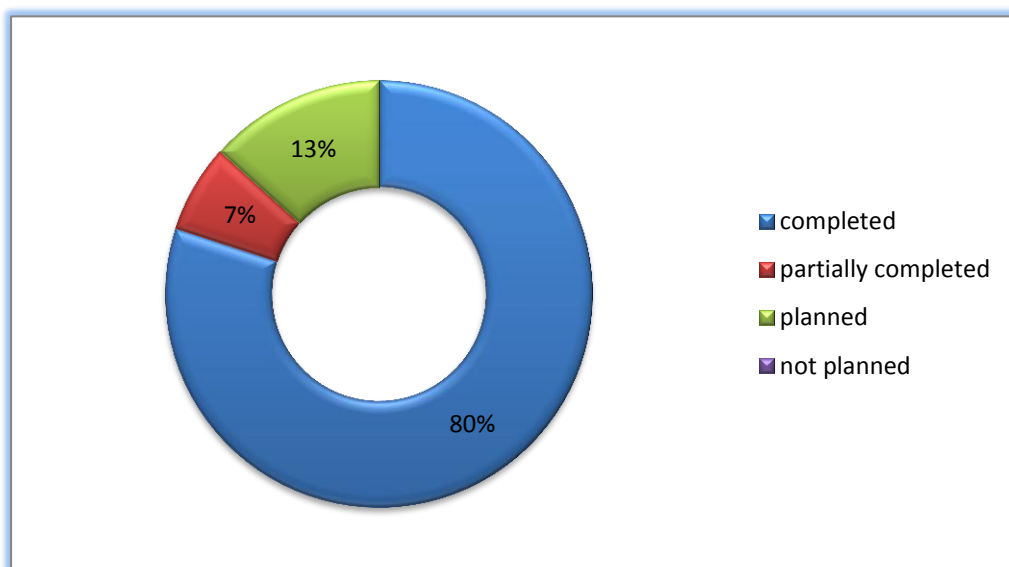
Finland (PC): Finnish Aviation Act is under revision process (now as a draft) and SSP (FASP) implementation to Aviation Act will be ready on fourth quartal of 2014.

Spain (PC): We have published a Law, that will be completed with a Royal Decree and an Agreement of the Council of Ministers.

Portugal (P): In the government - Expecting decision/publication in the oficial gazette.

2. SSP element 1.2(ii):

a. Safety management responsibilities & accountabilities

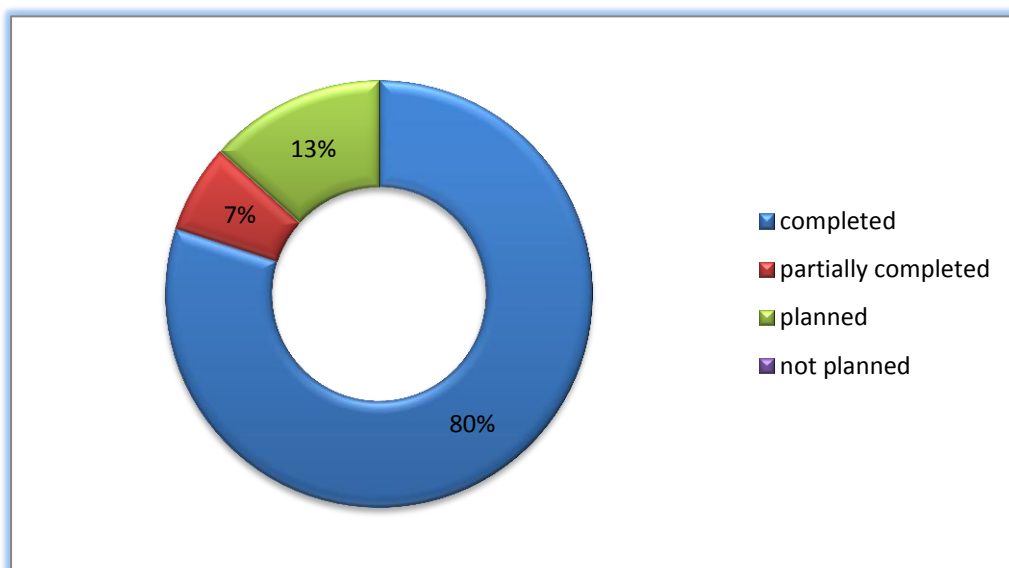


Summary

Twelve (12) States already defined and established management responsibilities and accountabilities of the respective regulatory organizations. Malta has partially completed this task, Portugal is about to implement it and Turkey plans to do so in the future.

Additional Observations

b. State Safety Policy & Objectives



Summary

Twelve (12) States have developed and implemented State safety policy and set

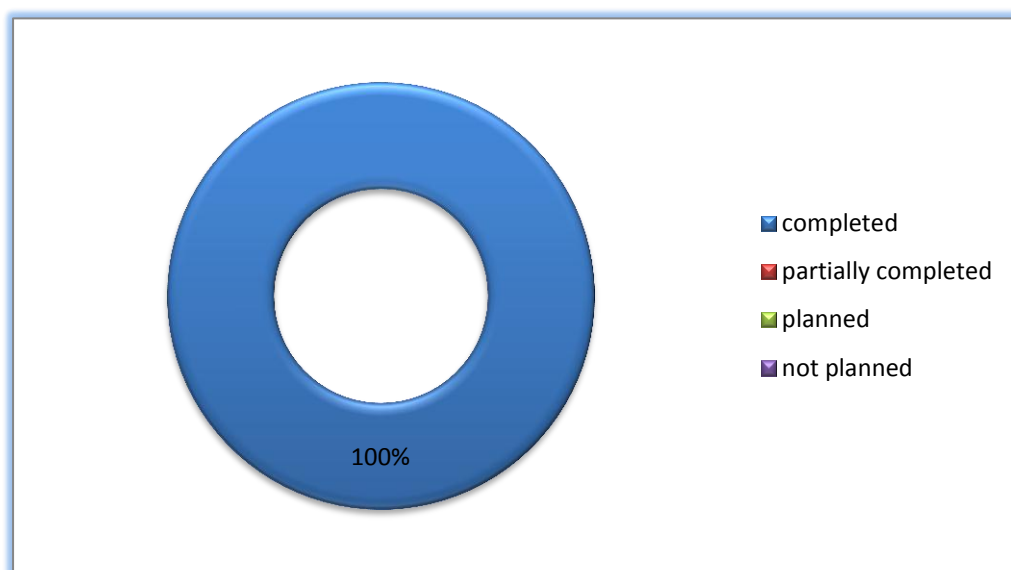
safety objectives. Spain has a draft of the policy and objectives that will be part of the Agreement of the Council of Ministers. Turkey and Portugal haven't adopted the State safety policy and objectives yet.

Additional Observations

Monaco (C): Evolution of the safety objectives in the 2nd version of the State Safety Action Plan, to be published before the end of the year.

Spain (PC): We have a draft version of the policy and the objectives. They will be part of the Agreement of the Council of Ministers

3. SSP element 1.3: Accident and serious incident investigation

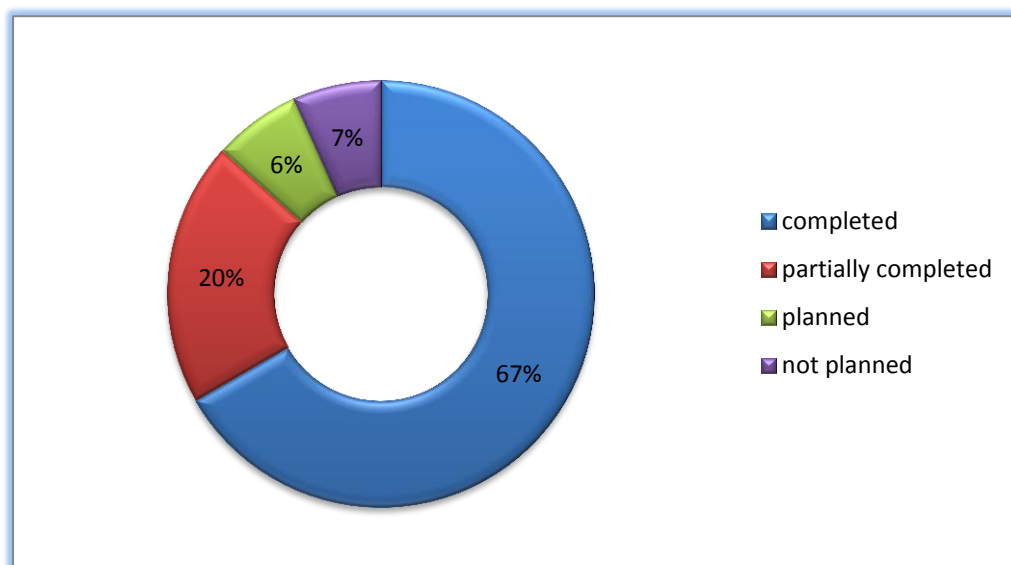


Summary

All States have established the mechanism to ensure that all accidents and serious incidents are investigated in order to prevent from such incidents in the future.

Additional Observations

4. SSP element 1.4(i): Establish basic enforcement (penalty) legislation



Summary

Ten (10) States have established enforcement legislation. Three (3) States (Monaco, Malta, Portugal) stated that penalty legislation had existed before SMS & SSP but it needs to be reviewed.

Additional Observations

Monaco (PC): Partially existing before SMS & SSP but needs to be review for the sake of clarity.

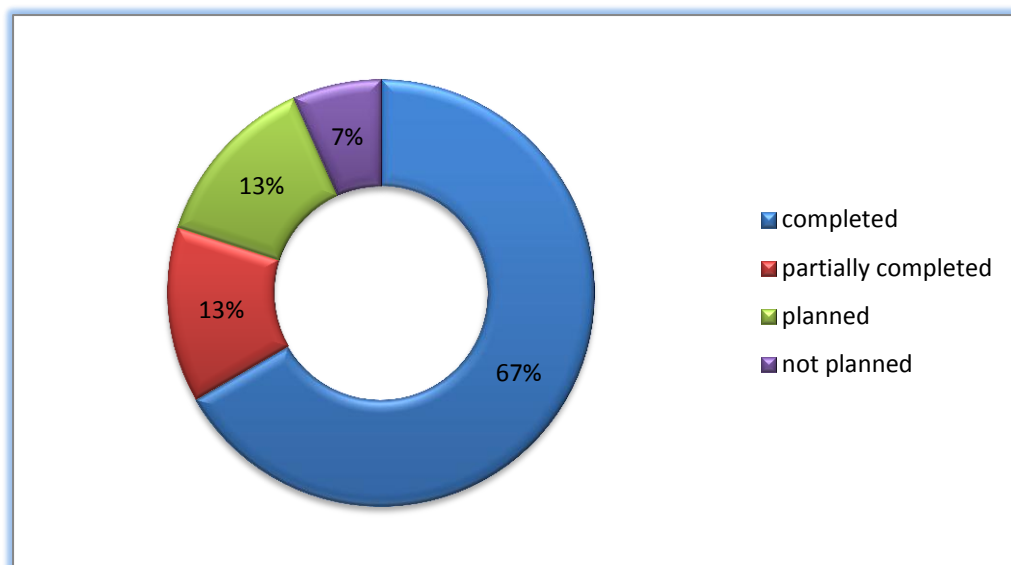
Malta (PC): The CAD is working to improve the penalty system with regards to the Basic Regulation.

Ireland (C): Provisions for penalties for infringements of aviation legislation (including fines and imprisonment) are established in National legislation.

Italy (P): A draft of a Law Decree is close to be submitted to the Government.

Portugal (PC): Necessary to review the actual legislation.

5. SSP element 3.1(i): State safety oversight and surveillance of its service providers



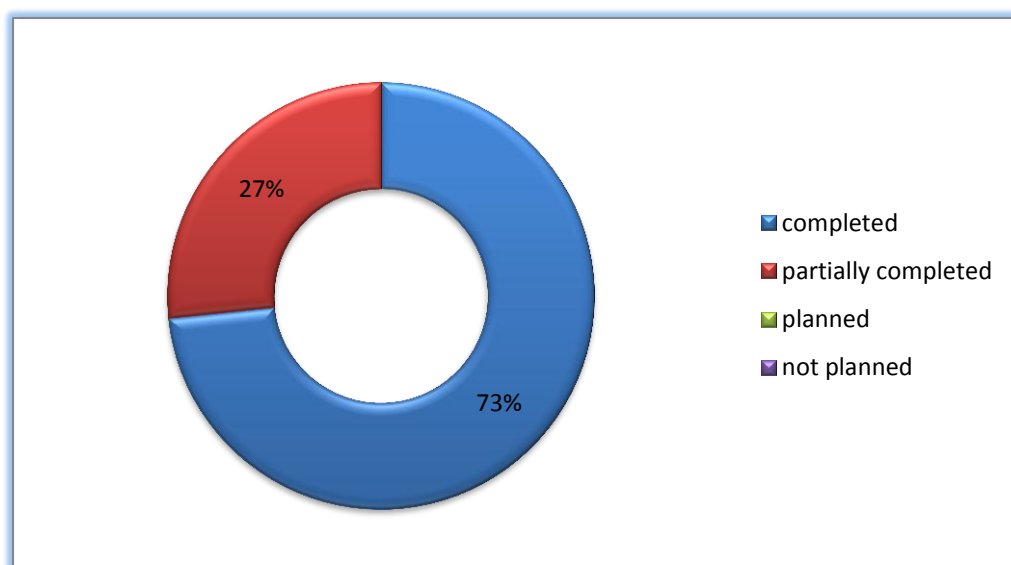
Summary

Thirteen (13) States have safety oversight programme in place, Turkey and Malta have partially completed this element.

Additional Observations

Spain (C): CAA will meet the safety oversight and surveillance requirements established by EU. EU is responsible to establish these requirements. Please clarify this question.

6. SSP element 2.1(i): SMS education & promotion for service providers



Summary

All States have already started to implement SMS educational and promotional activities for service providers into their SSPs. Eleven (11) States have already set their activities while the remaining four (4) States are still in the process of its implementation.

Additional Observations

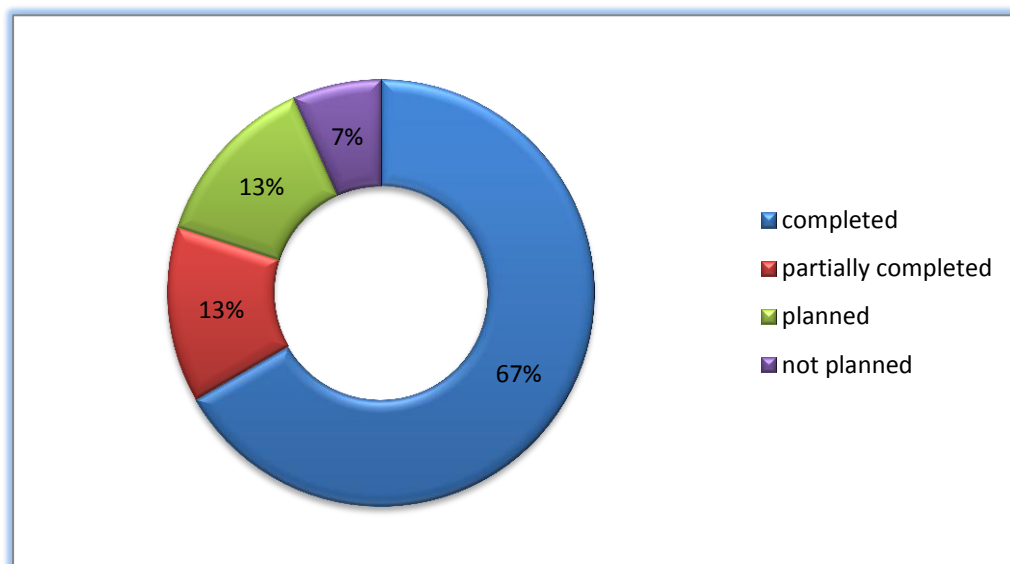
Monaco (C): One initial meeting was held to present the SMS requirements and now safety committee are organized by the CAA DG every 3 months.

Finland (C): Trafi has put SMS-guidance material, instruction and schedule on Trafi's web pages.

Sweden (C): SSP and SMS promotion is made at annual meetings with the service providers in each of the oversight areas (OPS, AIR, AGA, ATM etc.)

Spain (C): We have established several mechanisms to promote SMS between the service providers: Conferences, Working Groups....It is a continuous task.

Italy (PC): SMS guidelines have been recently issued for operators (Regulation 965/2012). Instead SMS guidelines for Certified Aerodromes and ATC providers must be revised since they were issued in past years. For remaining organisations guidelines should be issued.

PHASE 3**1. SSP element 1.4(ii): Enforcement Policy/Legislation to include:****a. Provision to prevent use or disclosure of safety data for purposes other than safety improvement****Summary**

Ten (10) States have particular provisions for safety data prevention already in place. Some of them had this provision already in national law before implementing SSP. Ireland and Montenegro are in the middle of the implementation, Monaco and Turkey haven't started yet but are planning to do so and Italy doesn't plan to implement such

provisions.

Additional Observations

Monaco (C): Relevant provisions should be added in the primary law, if accepted by the ministry. But legislation process is taking time.

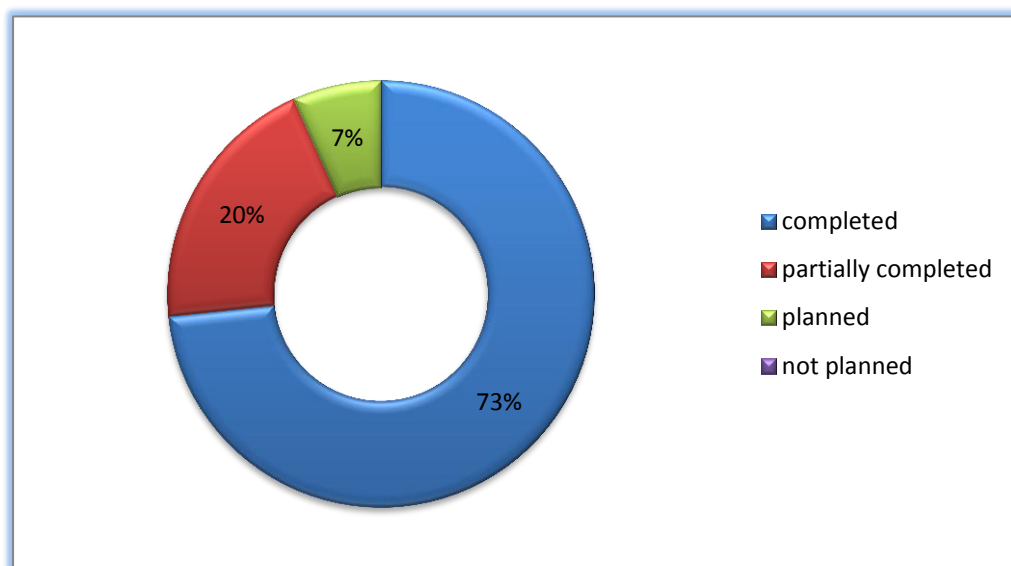
Finland (C): Protection of the safety data and reporter is already implemented in Finnish Aviation Act and in the Act that is about data publicity.

Sweden (C): Occurrence reports are protected from disclosure through national law.

Ireland (PC): Internal policy in place. Formal promulgation of policy to industry is outstanding.

Portugal (C): But need to redefine the provisions according to the new legislation.

b. Provision to protect the sources of information obtained from voluntary confidential reporting systems



Summary

Eleven (10) States have particular provisions for protection of the sources of safety information already in place. Three States (Sweden, Ireland, Montenegro) are partially finished with this task. Monaco plans to implement such provisions and stated that it is not easy to ensure confidentiality in small size of the civil aviation.

Additional Observations

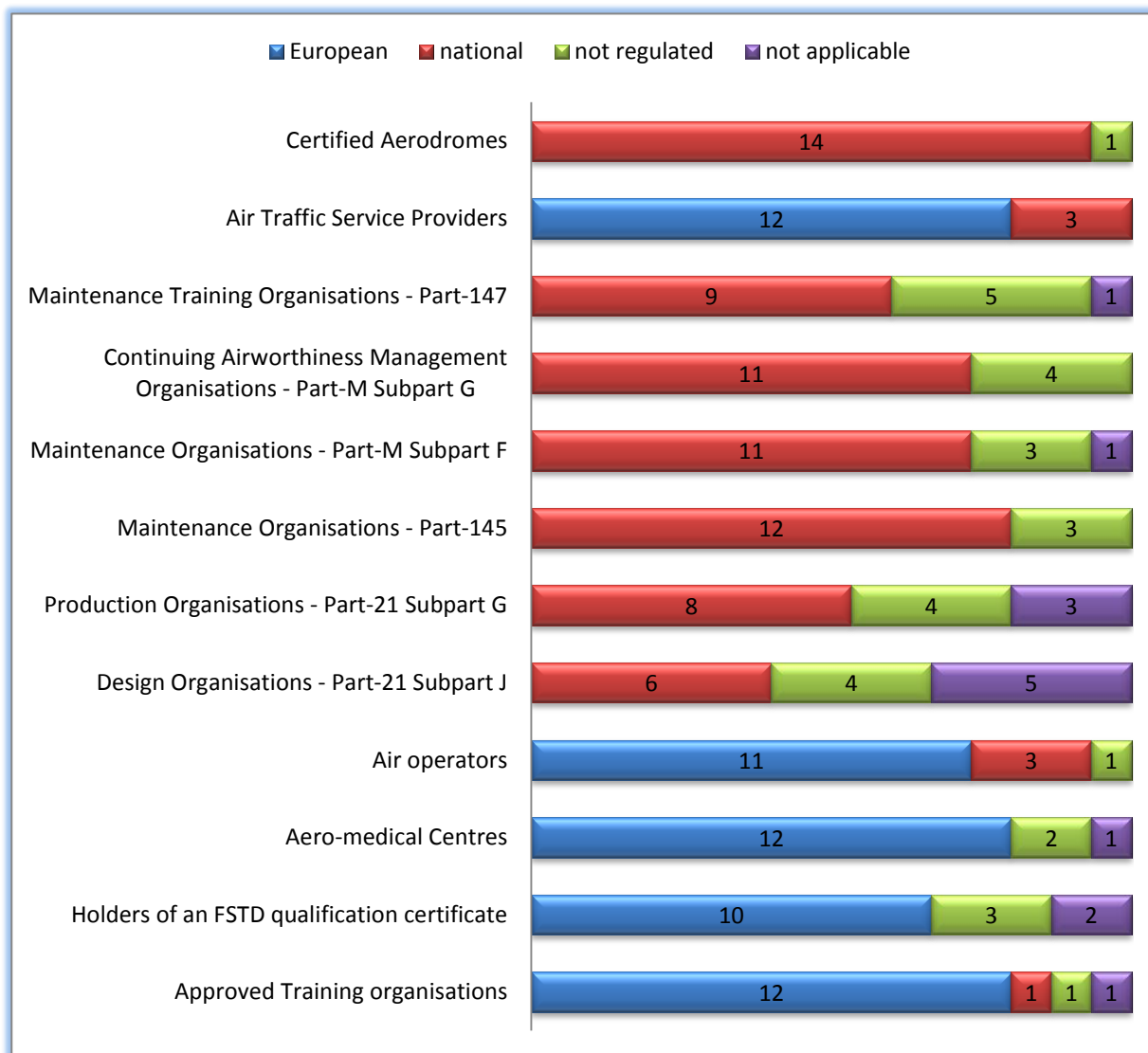
Monaco (P): Related to the comment to previous question. Confidentiality is not easy to ensure due to the size of the Civil Aviation, gathered in one heliport.

Finland (C): Finland has had voluntary reporting system since 1st April 2011. Finland has also had a very good mandatory reporting system via which Trafi gets about 4200 reports / year.

Sweden (PC): Voluntary reports are handled in the same system as the mandatory, but disidentified. All occurrence reports are protected from disclosure through national law.

Ireland (PC): Internal policy in place. Formal promulgation of policy to industry is outstanding.

2. SSP element 2.1(ii): Harmonized regulations requiring SMS implementation.



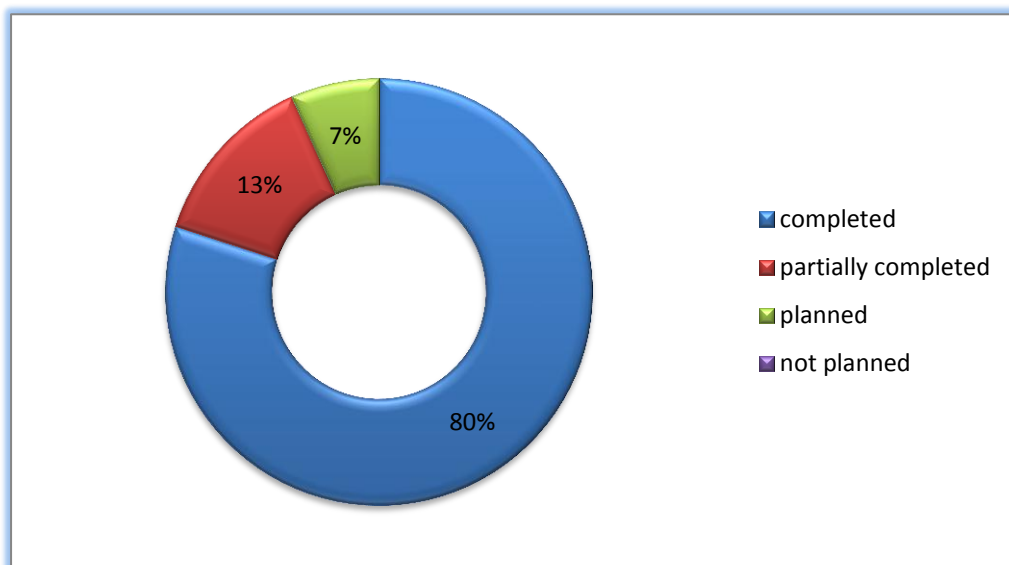
Summary

The table above shows the numbers of States and the type of regulation requiring SMS implementation they use for different aviation sectors.

Note: For Aerodromes, Design, Production, Maintenance, Maintenance Training and Continuous Airworthiness Organizations the European Legislation requiring SMS implementation has not been promulgated yet.

3. SSP element 3.2(i):

a. Safety data collection & exchange systems



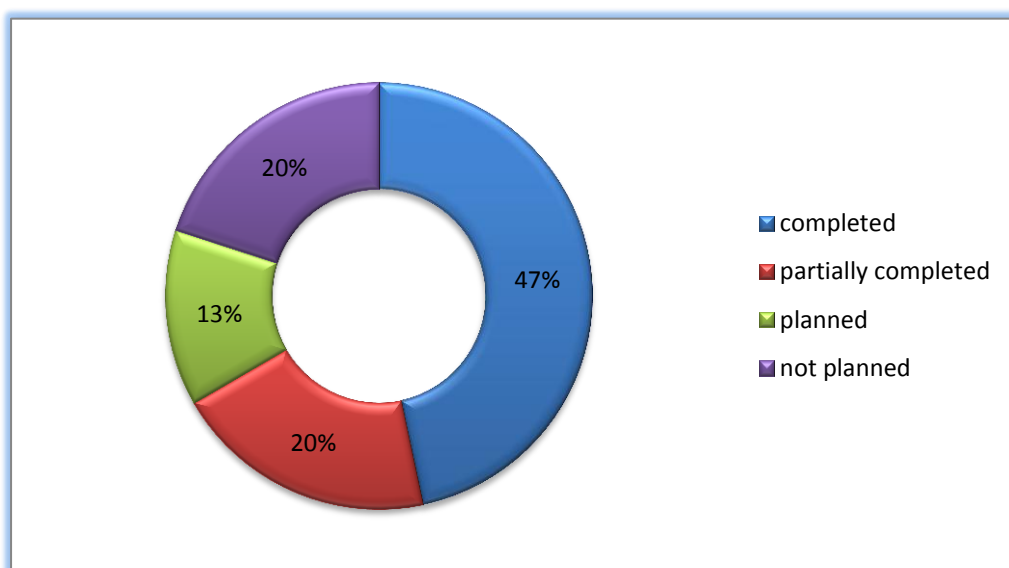
Summary

Twelve (12) States that have this task completed have mostly adopted the Directive's 2003/42/EC safety data collection and exchange systems requirements. Monaco and Malta are working on that and Turkey plan to do so in the future.

Additional Observations

Monaco (PC): Provisions are disseminated in the requirements for the different agreement/certificate but there is a lack of consistency and it is planned to gather the relevant requirements in one text.

b. Establish high consequence (or Tier 1) State safety performance indicators and target/alert levels



Summary

Seven (7) States established State safety performance indicators. Three (3) are partially finished, two (2) plan this step and three (3) States don't plan to establish the State safety performance indicators and target levels.

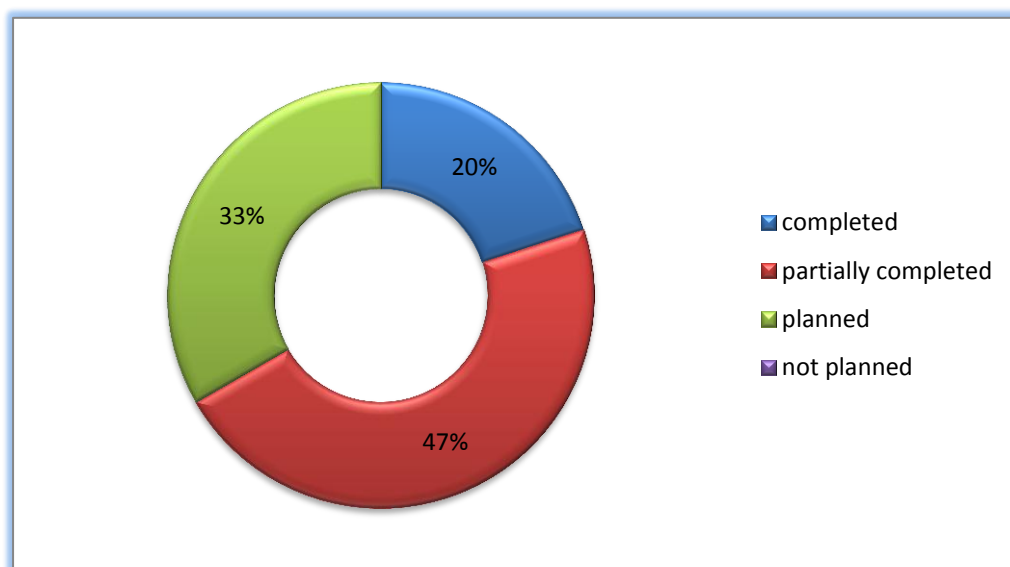
Additional Observations

Finland (C): First version of SPIs and SPTs were published in 8th April 2012 and the second version 25th March 2013.

Sweden (C): Accident statistics are collected and published regularly on our public website. Indicators are shown e.g. for runway excursions/incursions, airspace infringements, laser occurrences.

Ireland (C): Tier 1 and Tier 2 indicators are published in Annual Safety Review and on website.

Switzerland (PC): Presently only monitoring (no targets).

PHASE 4**1. SSP element 2.2: Service provider safety performance indicators****Summary**

Three (Netherlands, Montenegro, Portugal) States' service providers have established safety performance indicators. In four States of seven that are partially completed with this task only Air Traffic Service providers have established performance indicators. Five (5) other States are planning this element.

Additional Observations

Monaco (P): Operators have started to run their SMS in June 2013, thus more feedback is needed before being to define indicators & objectives.

Finland (PC): Airlines and ATC service provider in Finland have implementing /implemented Finnish CAA's SPIs. CAA's SPIs are developed in co-operation with

service providers and for ex. flight schools.

Sweden (P): The EU legislation will mandate this as part of the introduction of SMS requirements.

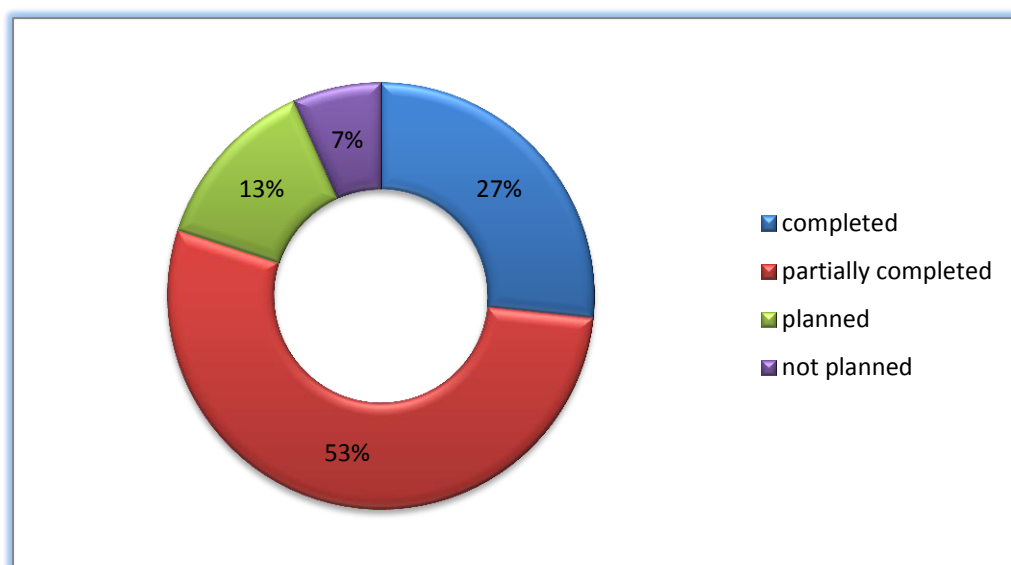
Spain (PC): We have established some safety performance indicators with the service providers to have a first idea of their level of safety. These indicators have not associated targets.

Ireland (PC): Identification of safety indicators is mature in most domains. Safety Targets are published in the ANS domain only.

Italy (PC): Completed only in the ATC sector.

Switzerland (PC): Presently only monitoring (no targets).

2. SSP element 3.1(ii): Incorporation of service providers' SMS and safety performance indicators as part of routine surveillance program.



Summary

Four (4) States have incorporated service providers' SMS into the routine surveillance program. The most of States (8) are working on it.

Additional Observations

Monaco (PC): SMS audits are integrated in the surveillance programme but we need more feedback before being able to monitor indicators.

Finland (C): Airlines and ATC service provider in Finland have implementing /implemented Finnish CAA's SPIs. In National FDM-group-meetings twice a year CAA and service providers are comparing their analyses on SPIs. Surveillance program will start to implement SPI-oversight after service providers and CAA have got accustomed to oversight them. CAA will oversight the function of service providers SMS after implemented on 8th April 2014.

Sweden (P): The EU legislation will mandate this as part of the introduction of SMS requirements.

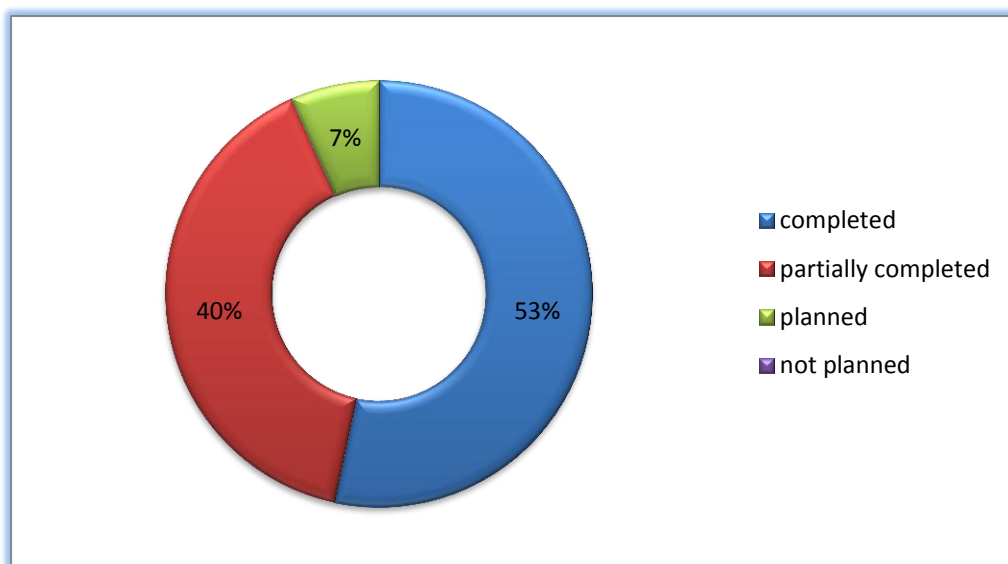
Spain (PC): SMS is part of the routine surveillance program in case of SMS is required. For example, in case of aerodromes, SMS is inspected.

Ireland (PC): Surveillance programmes include the monitoring of performance against safety targets identified for ANS and also for key safety indicators in other domains as identified in the European Aviation Safety Plan.

Switzerland (PC): SPI being shared and monitored. SMS effectiveness part of routine surveillance.

3. SSP element 3.2(ii):

a. Implement voluntary/confidential safety reporting systems



Summary

The most States (8) have already implemented voluntary/confidential safety reporting system. In many cases the system is the same for voluntary and for confidential reports. Six (6) States need to work on it and one State hasn't started yet but is planning to do so.

Additional Observations

Monaco (PC): The reporting system need to be clarify at the regulation level but also at the implementation level (forms, means for reporting, etc). Confidentiality is hard to ensure in a small civil aviation.

Finland (C): Finland has had voluntary reporting system since 1st April 2011. Finland has also had a very good mandatory reporting system via which Trafi gets about 4200 reports / year.

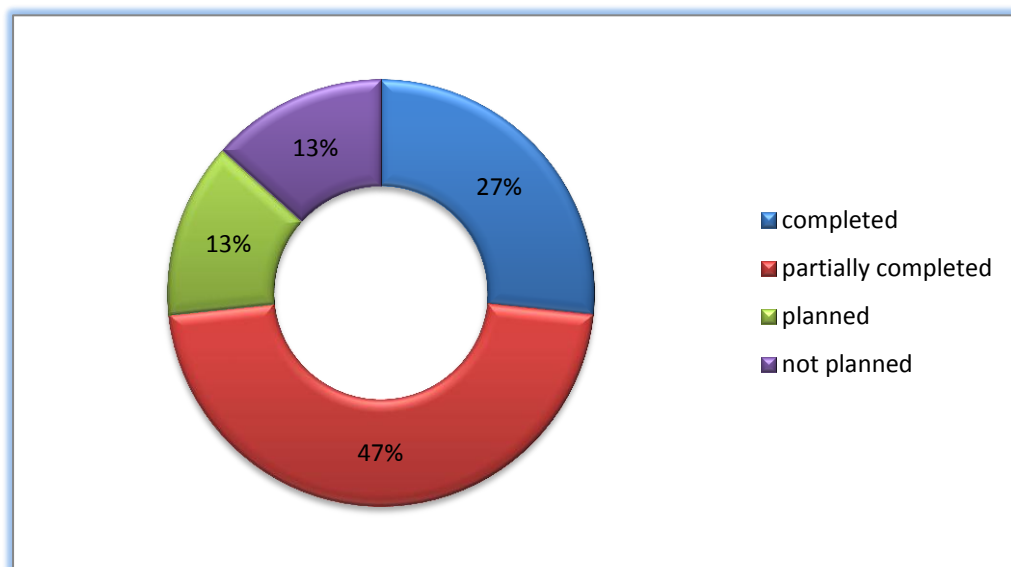
Sweden (PC): Voluntary reports are handled in the same system as the mandatory, but disidentified. All occurrence reports are protected from disclosure through national law.

Spain (C): SNS collects mandatory and voluntary occurrence reports.

Ireland (PC): The voluntarily reporting system is currently only directly accessible to the civil aviation authority.

Italy (PC): Voluntary reporting system is managed by Safety Investigation Authority and is not accessible to the CAA.

b. Establish lower consequence safety indicators with target/alert level monitoring as appropriate



Summary

Four (4) States have established lower consequence safety indicators. Seven (7) States are working on it and Seven (7) other States plan to establish that. Two States don't plan to establish lower consequence safety indicators.

Additional Observations

Monaco (PC): Safety indicators are in place at this level but target are not set.

Finland (C): First version of SPIs and SPTs were published in 8th April 2012 and the second version 25th March 2013.

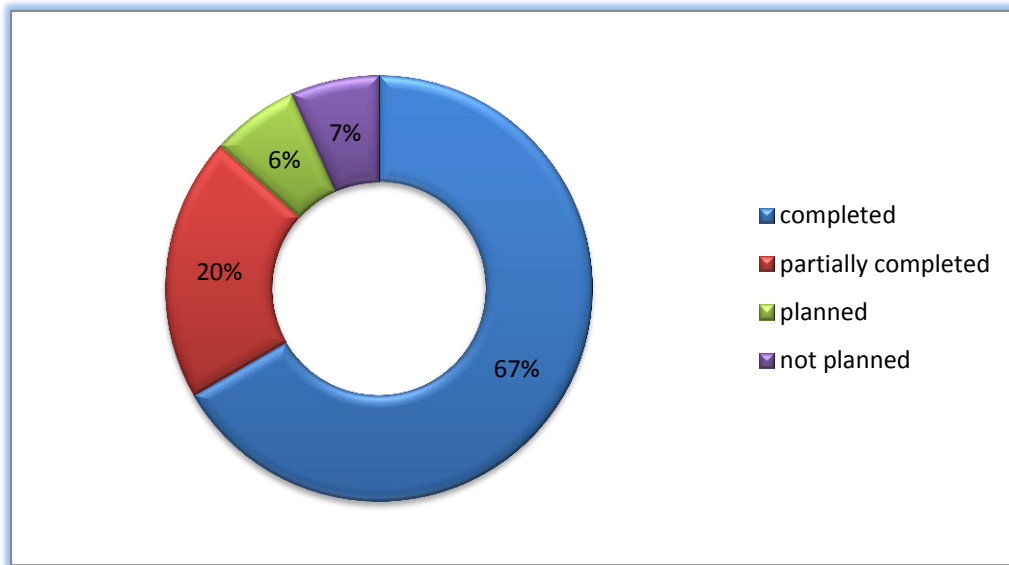
Sweden (C): We have some lower level indicators running and are planning to introduce more. Indicators are analysed by the internal Aviation Safety Analysis Forum every second month.

Ireland (PC): Organisation risk profiles established in some domains consider lower consequence safety indicators as well as other risk and performance related issues

France (PC): Done for the ATM domain. Waiting for guidance in the other domains.

Switzerland (C): Presently only monitoring (no targets).

c. Promote safety information exchange with and amongst service providers and other States



Summary

Ten States (10) have committed to actively promote information exchange. Some of them follow NoA activities.

Additional Observations

Finland (C): Trafi is working actively in NoA, within NEFAB (hosted the group developing NEFAB safety information change processes) and is continuously publishing analyses, safety bulletins and has published Finland's Annual Safety Review since 2012.

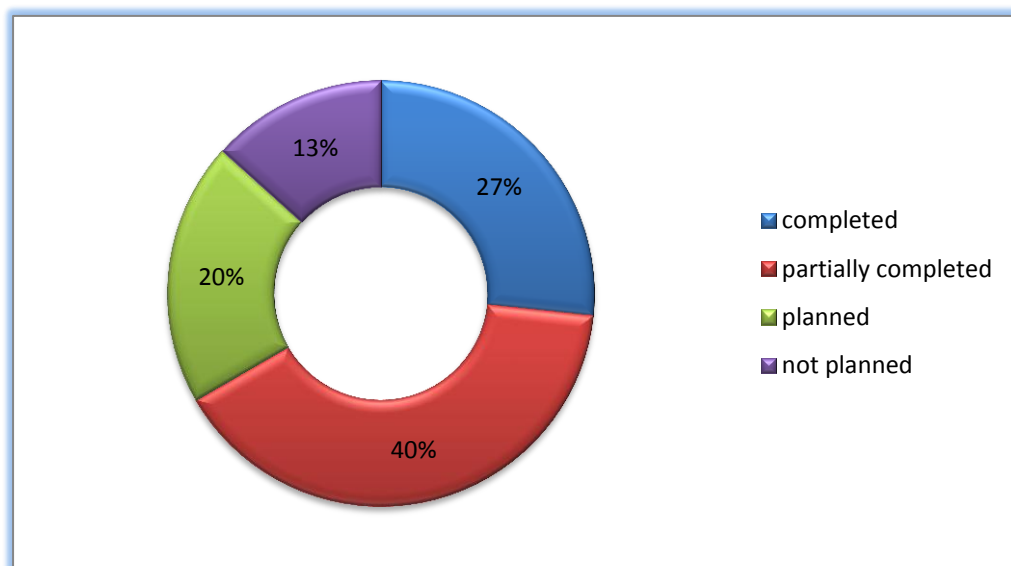
Sweden (PC): Work is underway in the NoA activities. We are open for exchange of data as long as it does not conflict with the national Secrecy Act.

Spain (C): We have established several Committees with the Industry to share safety information.

Ireland (C): Annual Safety Review and Annual State Safety Plans are published. Full involvement in EASA initiatives on data sharing

Switzerland (C): Presently only monitoring (no targets).

4. SSP element 3.3: Prioritize inspections and audits based on the analysis of safety risk or quality data where applicable



Summary

Four (4) States reviewed existing surveillance and audit programmes, six (6) States are not finished yet, three (3) plan this in the future while two (2) States don't plan this task.

Additional Observations

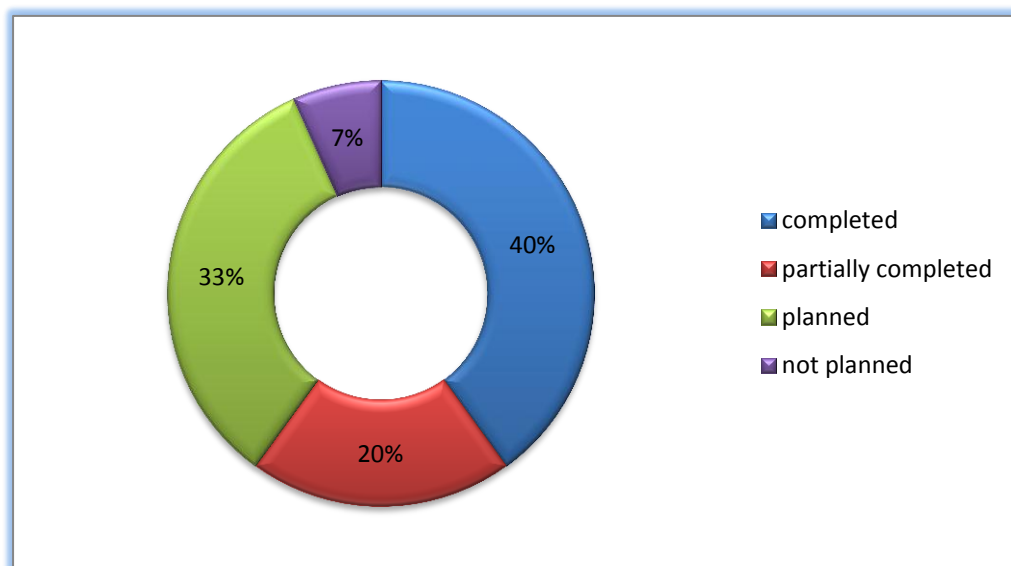
Finland (C): Trafi's Transport analyses department has done safety analyses for audit preparation in AOC-audits since 2010. During 2012 this has also been done for ATC/AD and maintenance organisation audits. Trend analyses and SPI-follow up and monthly safety reviews (tilakatsaus) are also used as a background information in prioritizing action done by Trafi.

Sweden (PC): Every oversight area is mandated to use risk based methods for the planning of oversight.

Spain (C): We have internal Committees to prioritize inspections and audits based on safety data that is collected by different mechanisms.

Switzerland (PC): Outputs of SMS system are used by Safety Divisions for planning oversight activity.

5. SSP element 3.1(iii): Establish internal review mechanism covering the SSP to assure continuing effectiveness and improvement



Summary

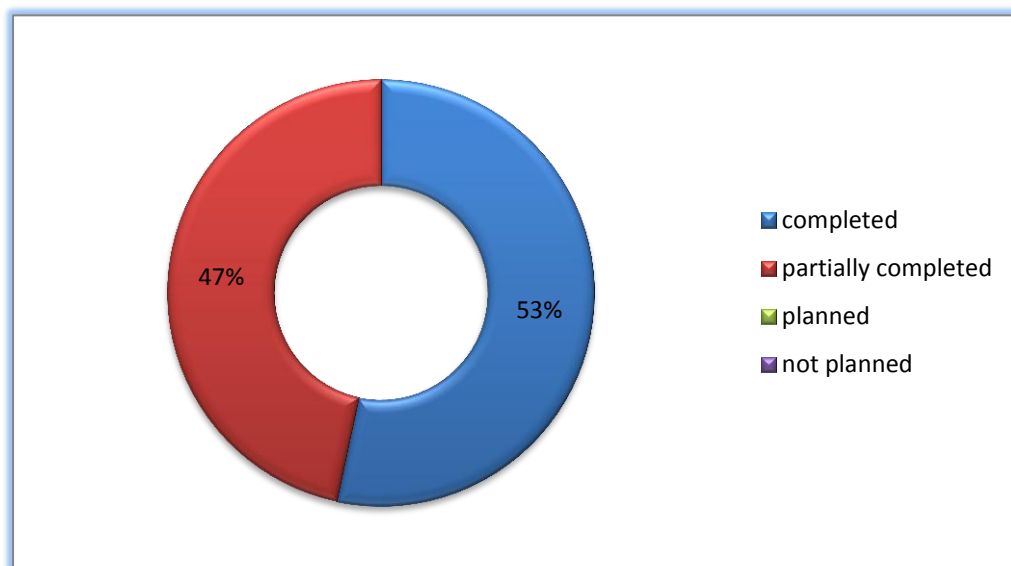
Six (6) States have implemented internal review mechanism and they are on regular basis monitoring the improvement and assuring continuing effectiveness. Three States (3) are still working on its implementation. Five (5) States plan this mechanism to establish soon. Italy doesn't plan this element.

Additional Observations

Sweden (PC): The SSP is planned to be evaluated every year and is a part of the internal quality system, and is as such subject to internal auditing.

Ireland (C): Updates required in line with Annex 19 and developing EU regulations.

Switzerland (C): SSP is reviewed annually by SRM. Updates approved by Board.

TRAINING AND COMMUNICATION THROUGH PHASE 1 TO 4**1. SSP element 4.1, 4.2:****a. Internal training, communication and dissemination of safety information****Summary**

It is obvious that all States realized the importance of the training. Eight (8) States have already set the training policy and have implemented SMS training programme. Seven (7) States are not finished yet but they are working on the implementation of this element at the moment.

Additional Observations

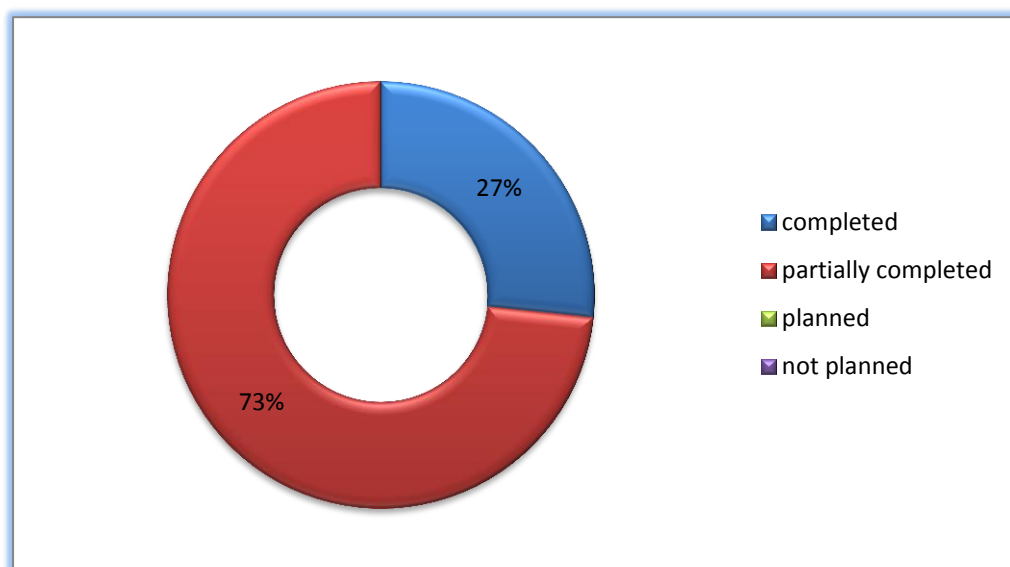
Finland (C): Internal safety communication is done for ex. in Monthly Safety Reviews (see 3.3). CAA staff has also been trained about SSP (FASP).

Sweden (PC): Training is basic SSP concepts were given during the period 2008-2010. SSP is also a part of the the basic and recurrent training of inspectors.

Spain (C): We have two courses: initial and advanced SSP. The initial SSP course will be mandatory for all technical AESA staff. We have different mechanisms to share safety information: ad-hoc working groups, internal Committees.

Switzerland (C): Internal training concept and controlling conducted by DD Division.

b. External training, communication and dissemination of safety information



Summary

Four (4) States have implemented the mechanism for external training, communication and dissemination of the safety information. Eleven (11) States are partially completed.

Additional Observations

Sweden (PC): We are publishing safety information through leaflets for the aviation stakeholders, and other relevant information on our webpage. Safety Analyses are published yearly. Information about SMS and SSP is given at annual seminars with service providers in each oversight area.

Spain (C): AESA do not provide external training. Regarding communication and dissemination of safety information, we have different mechanisms in place: ad-hoc working groups, Committees with the Industry, AESA website, e-mails.

Ireland (PC): Mature SMS training and exchange most domains. Work beginning in the Airworthiness domain in line with EU rulemaking plans for SMS in this domain.

FINAL THOUGHTS ON SSP

1. What is in your opinion the most difficult task with implementing SSP?

Summary

Monaco: Implementing an efficient safety reporting tool is not easy; information have to be gathered in a way that ease the analysis but also that allow to obtain results and usefull outcomes (see the difficulties with ECCAIRS). Also, having in mind that the main purpose of the SSP is to ensure the efficient management of the operators safety through their SMS, it is difficult to convince them about the necessity of this new requirement since we are not able to provide any feedback at this stage.

Netherlands: Establish and maintain the SSP coordination mechanism. Establish an

effective ALoS for the different domains.

Finland: To define the acceptable level of safety to promote SSP which is sometimes considered as a difficult and complicated issue (which it is not).

Turkey: Establishment of enforcement policy.

Sweden: The SSP concept requires a "break in" into the core management processes of the authority (budgeting, business planning, HR recruitment processes etc.). This is hard to achieve since they challenge old well built up structures and competences (hierarchies of power and mandate) within the management. SSP is still seen as something "on top" of the Normal Business Process. There is however an increasing awareness about this and that is a good start.

Iceland: Make it simple in a small Authority - EASp is way too loosely connected to the main aviation subjects as they are defined in the SARPs or Annexes. SMS is to complement compliance requirements not replace them. A new balance is needed between Compliance and the extra burden provided by the SMS/SSP cloud.

Spain: Getting the involvement of different people.

Ireland: The aviation system has achieved it's excellent safety record due in the main to the success of compliance based oversight. It is a cultural change to move towards risk and performance based oversight which needs to be carefully managed in order to ensure it is understood by the state bodies and communicated clearly to industry.

France: Define managable and relevant tier 2 safety indicators.

Montenegro: Definition of SPI and measuring of performance.

Portugal: The Safety Culture is understood and practiced in diffrent points of view concerned the NAA and the Political decision makers.

Switzerland: Reaching awareness and commitment (internal and external) for the use and benefit of the SSP.

2. What would you have done differently?

Summary

Monaco: I would have spent more effort on the safety reporting, particularly on the means for reporting and on the tools for analysis. Indeed, this is what feeds the SSP and allow it to be efficient. Also it could have been of benefit to organized a training for each industry, which is feasible in Monaco due to the small size of the CAA. This may not have accelerated the process because the operator always wait the dead line, but this could have helped to obtain SMS more efficient than conceptual.

Netherlands: We would like to establish an effective but also challenging ALoS and are looking for ways to monitor and ultimately enforce in a pragmatic way Safety management.

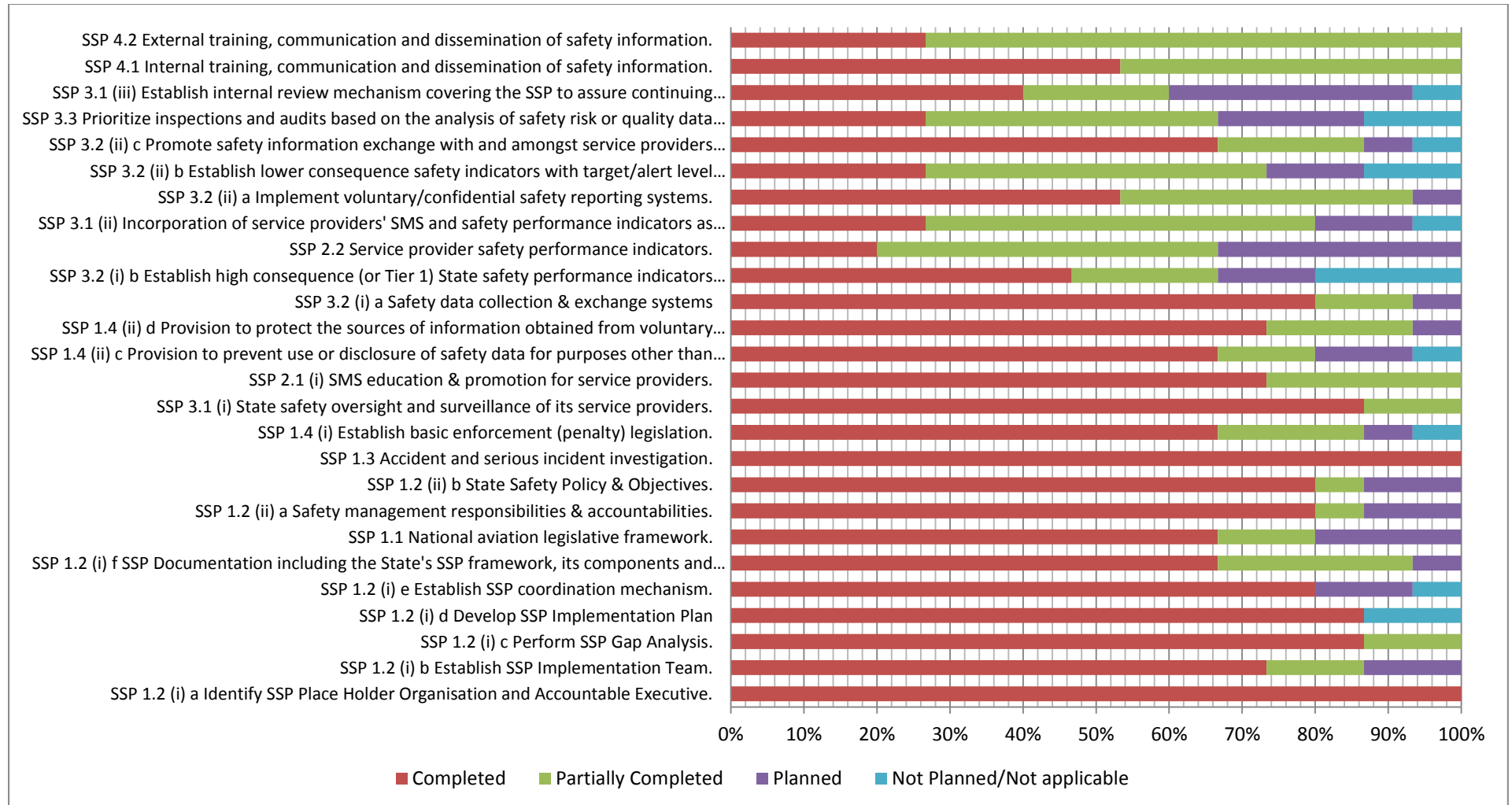
Iceland: I would have used the Annexes with few extra requirements and then built the SSP into the Quality/Compliance monitoring system of the Authority to monitor

compliance and the quality of the actual performance and Quality systems, ISO 9001 in essence does that - you have to take action if your design and production/service processes are not doing what they are intended to accomplish. In essence SSP setup establishes a new department within an authority but should complement the Quality department. To summarize: New basic requirements into the SARPs and thereby the EASA Parts and a new type of quality department that monitors both compliance and performance.

Ireland: I would recognise that the SSP is a cultural change project and consequently devote significant amount of the resources on communications, training and guidance for all the stakeholders.

Switzerland: Nothing. We are learning by doing and improving the SSP with every review (conducted on a regular basis).

OVERALL SUMMARY



SSP Phased Approach (as proposed in ICAO SMM Edition 3)

Phase I	Phase II	Phase III	Phase IV
SSP element 1.2 (i) a. Identify SSP Place Holder Organisation and Accountable Executive. b. Establish SSP Implementation Team. c. Perform SSP Gap Analysis. d. Develop SSP Implementation Plan e. Establish SSP coordination mechanism. f. SSP Documentation including the State's SSP framework, its components and elements.	SSP element 1.1 National aviation legislative framework. SSP element 1.2 (ii) a. A Safety management responsibilities & accountabilities b. State Safety Policy & Objectives SSP element 1.3 Accident and serious incident investigation SSP element 1.4 (i) Establish basic enforcement (penalty) legislation. SSP element 3.1 (i) State safety oversight and surveillance of its service providers. SSP element 2.1 (i) SMS education & promotion for service providers.	SSP element 1.4 (ii) c. Provision to prevent use or disclosure of safety data for purposes other than safety improvement. d. Provision to protect the sources of information obtained from voluntary confidential reporting systems. SSP element 3.2 (i) a. Safety data collection & exchange systems b. Establish high consequence (or Tier 1) State safety performance indicators and target/alert levels.	SSP element 2.2 Service provider safety performance indicators. SSP element 3.1 (ii) Incorporation of service providers' SMS and safety performance indicators as part of routine surveillance program. SSP element 3.2 (ii) a. Implement voluntary/confidential safety reporting systems. b. Establish lower consequence safety indicators with target/alert level monitoring as appropriate. c. Promote safety information exchange with and amongst service providers and other States. SSP element 3.3 Prioritize inspections and audits based on the analysis of safety risk or quality data where applicable. SSP element 3.1 (iii) Establish internal review mechanism covering the SSP to assure continuing effectiveness and improvement.
SSP element 4.1 Internal training, communication and dissemination of safety information. SSP element 4.2 External training, communication and dissemination of safety information.			