



EAC

No. 19-12

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1. Background and Purpose

The Tool has been developed by the SM ICG and is adopted by the Egyptian Civil Aviation Authority to be used for assessing an organization's SMS. It can be used for initial assessment or ongoing surveillance and oversight. The Tool is based on a series of indicators that help ECAA assess the effectiveness of an organization's SMS. It requires an interaction with the organization including face to face discussions and interviews with a cross section of people as part of the assessment. It recognizes the difference in oversight methodologies from traditional compliance-based oversight to performance-based oversight that assesses not only compliance but also the effectiveness of the SMS.

It has been designed to indicate the expected standard of an organization's SMS in terms of compliance with the SMS regulation and its performance to effectively manage safety risk.

1.1 Initial assessment

The ECAA may use the tool as part of an initial assessment and should define the expectations on the individual indicators before a certificate or Approval is issued.

For example, an initial assessment could be based on a desk top review of the documentation that focuses on assessing whether the 'indicators for compliance and performance' are present and suitable. Once the desk top review has been satisfied an on- site visit should be carried out to assess whether the indicators are operating and overall effectiveness is achieved.

The on- site visit should normally be carried out by a team including a team leader with an appropriate level of competence in SMS and technical specialists to support the assessment. It is important to structure the assessment in a way that allows interaction with a number of people at different levels of the organization to determine how effective aspects are throughout the organization. For example, to determine the extent that the safety policy has been promulgated and understood by staff throughout the organization will require interaction with a cross-section of staff.

For small organizations it may be more practical to have a single assessor appropriately trained in SMS and with the technical competencies to assess the organization.

Another approach is for the regulated organization to partially complete the tool as a self-assessment, including the 'how it is achieved' box, and submit this to the ECAA, who would decide whether it was sufficiently progressed to warrant an on-site visit and then verify and validate the organizations self-assessment.

1.2 Ongoing surveillance

For ongoing surveillance ECAA may also define expectations for individual indicators. However, it is recommended that all individual 'indicators of compliance and performance' should be at least operating and that effectiveness is achieved in all of the elements.

2. Using the tool (instructions)

This tool is supposed to be used in conjunction with the excel sheet template developed by the Safety Management General Directorate in ECAA.

This Tool evaluates the compliance and effectiveness of the SMS through a series of indicators. It is set out using the 12 elements of the ICAO SMS Framework with the Framework definition followed by an effectiveness statement for that element. For each element, a series of ‘indicators for compliance and performance’ is listed followed by a series of ‘indicators of best practice’. Each indicator should be reviewed to determine whether the indicator is present, suitable and operating and effective, using the definitions and guidance set out below, so that the overall effectiveness of the element can be justified and supported.

To fill out the excel sheet for evaluation, use either “1” or “0” in the “Present, Suitable, Operating, Effective” boxes for each indicator.

The tool would normally be used by the ECAA to record and document the assessment. Alternatively it can be partially completed by the organization to assess itself (“How it is achieved” column) and by the ECAA to verify and validate the organization's assessment (“Verification” column and “Summary comments” box).

3. Applicability

The evaluation tool can be used to assess any regulated organization. However, due consideration should be given to the size, nature and complexity of an organization in carrying out the assessment and that for smaller organizations a reduced number of indicators may be used as defined by ECAA.

4. DEFINITIONS USED IN THE TOOL

Present

There is evidence that the ‘indicator’ is clearly visible and is documented within the organisation’s SMS Documentation.

Suitable

The indicator is suitable based on the size, nature, complexity of the organisation and the inherent risk in the activity, including consideration of the industry sector.

Operating

There is evidence that the indicator is in use and an output is being produced.

Effective

There is evidence that the indicator is effective and achieving the desired outcome. Effective indicators must be present, suitable and operating.

Evidence

Evidence includes documentation, reports, records of interviews and discussions and is likely to vary for different levels of indicator assessment. For example, for an indicator to be present the evidence is likely to be documented only, whereas for assessing whether it is operating it may involve assessing records as well as face to face discussions with personnel within an organization.

‘How it is achieved’ should include summary statements and any references to documentation and records.

Verification

The Verification Column should be for the ECAA to record any observations, conversations, records and documents sampled.

Summary comments

Once all indicators have been assessed by the ECAA, a judgement can be made on whether the overall effectiveness of the ICAO element has been achieved; this should be noted in the summary comments box.

The SMS Journey

For most organizations SMS will take time to implement and several years to mature to a level where it is effective. The following diagram shows the different levels of SMS maturity as an organization implements and develops its SMS and it also shows how the tool is used to assess the indicators against the service provider’s SMS maturity.

The evaluation tool can be used in stages looking initially for whether the key elements of an SMS are present and suitable. At a later stage the SMS can be assessed for how well it is operating and effective but it also recognized best practice. Service Providers can always strive towards excellence as part of their continuous improvement programs and the tool allows that best practice to be assessed.

5. SAFETY POLICY AND OBJECTIVES

5.1 MANAGEMENT COMMITMENT AND RESPONSIBILITY

The organization shall define its safety policy which should be in accordance with international and national requirements, and which shall be signed by the Accountable Executive of the organization. The safety policy shall reflect organizational commitments regarding safety, including a clear statement about the provision of the necessary human and financial resources for its implementation and be communicated, with visible endorsement, throughout the organization. The safety policy shall include the safety reporting procedures and clearly indicate which types of behaviours are unacceptable and shall include the conditions under which disciplinary action would not apply. The safety policy shall be periodically reviewed to ensure it remains relevant and appropriate to the organization.

EFFECTIVENESS is achieved when the organization has defined its safety policy that clearly states its intentions, safety objectives and philosophies and there is visible evidence of safety leadership and management ‘walking the talk’ and demonstrating by example.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
5.1.1	There is a safety policy that includes a commitment towards achieving the highest safety standards signed by the Accountable Executive.						
5.1.2	The organization has based its safety management system on the safety policy.						
5.1.3	The Accountable Executive and the senior management team promote and demonstrate their commitment to the Safety Policy through active and visible participation in the safety management system.						
5.1.4	The safety policy is communicated to all personnel with the intent that they are made aware of their individual						

	contributions and obligations with regard to Safety.						
5.1.5	The safety policy includes a commitment to observe all applicable legal requirements, standards and best practice providing appropriate resources and defining safety as a primary responsibility of all Managers.						
5.1.6	The safety policy actively encourages safety reporting.						
5.1.7	The safety policy states the organization's intentions, management principles and commitment to continuous improvement in the safety level.						
5.1.8	The safety policy is reviewed periodically to ensure it remains current.						
5.1.9	There is commitment of the organization's senior management to the development and ongoing improvement of the safety management system						
5.1.10	A disciplinary policy has been defined that clearly identifies the conditions under which punitive action would be considered (e.g. illegal activity, negligence or willful misconduct).						
5.1.11	There is evidence of decision making, actions and behaviours that reflect a positive safety culture.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
5.1.12	Personnel at all levels are involved in the establishment and maintenance of the safety management system						
5.1.13	There is one aviation safety policy used throughout the organization and it is implemented at all levels of the organization						
5.1.14	The safety policy is clearly visible, or available, to all personnel and is included in key documentation and communication media						
5.1.15	Safety policy objectives drive the organization's goals and mission statements.						
5.1.16	The organization regularly verifies that personnel throughout the organization are familiar with and have understood the policy and its message						
5.1.17	The Accountable Executive demonstrates their commitment by attending training and /or safety conferences.						
5.1.18	Senior management has adopted an integrated safety planning process with published and measurable safety targets and objectives						

5.1 Summary Comments

5.2 SAFETY ACCOUNTABILITIES

The organization shall identify the Accountable Executive who, irrespective of other functions, shall have ultimate responsibility and accountability, on behalf of the organization, for the implementation and maintenance of the SMS. The organization shall also identify the safety accountabilities of all members of senior management, irrespective of other functions, as well as personnel, with respect to the safety performance of the SMS. Safety responsibilities, accountabilities and authorities shall be documented and communicated throughout the organization, and shall include a definition of the levels of management with authority to make decisions regarding safety risk tolerability.

EFFECTIVENESS is achieved when there are clear lines of safety accountabilities throughout the organization including an accountable person who has ultimate accountability for the SMS and the Accountable Executive and management team fully understand the risks faced by the organization.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
5.2.1	An Accountable Executive has been appointed with full responsibility and ultimate accountability for the SMS to ensure it is properly implemented and performing effectively.						
5.2.2	The Accountable Executive has control of the financial and human resources required for the proper implementation of an effective SMS.						
5.2.3	The Accountable Executive is fully aware of their SMS roles and responsibilities in respect of the safety policy, safety standards and safety culture of the organization.						
5.2.4	Safety accountabilities, authorities and responsibilities are defined and documented throughout the organization.						
5.2.5	Personnel at all levels are aware of and understand their safety accountabilities, authorities and responsibilities regarding all safety management processes, decisions and actions.						

5.2.6	Safety management is shared across the organization (and is not just the responsibility of the Safety Manager and their team).						
5.2.7	There are documented management organizational diagrams and job descriptions for all personnel.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
5.2.8	There is evidence of personnel involvement and consultation in the establishment and operation of the SMS.						
5.2.9	There is evidence of personnel involvement and consultation in the establishment and operation of the SMS.						
5.2.10	Safety accountabilities throughout the organization are clearly documented and individuals sign for their accountabilities.						
5.2.11	Key safety activities are clearly described in senior management duties and responsibilities and are incorporated into personnel performance targets.						
5.2.12	There is evidence that senior management recognizes the significance of contributions from all levels of the organization and has a mechanism for acknowledging those contributions.						

5.2 Summary Comments

5.3 APPOINTMENT OF KEY PERSONNEL

The organization shall identify a Safety Manager to be the responsible individual and focal point for the implementation and maintenance of an effective SMS.

EFFECTIVENESS is achieved when the SMS is facilitated by the responsible individual and there is a safety structure of key personnel from the various operational areas of the organization. Business area heads are actively engaged in the safety management system.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
5.3.1	A competent person with the appropriate knowledge, skills and experience has been nominated to manage the operation of the SMS.						
5.3.2	The person managing the operation of the SMS fulfils the required job functions and responsibilities.						
5.3.3	There is a direct reporting line between the Safety Manager and the Accountable Executive.						
5.3.4	The organization has allocated sufficient resources to manage the SMS including manpower for safety investigation, analysis, auditing and promotion.						
5.3.5	Personnel in key safety roles are kept current through additional training and attendance at conferences and seminars.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
5.3.6	The organization has established a structured safety committee or equivalent, appropriate for the size and complexity of the						

	organization, including a full range of senior management representatives.						
5.3.7	The Safety Committee or its equivalent monitors the safety performance of the operations and the effectiveness of the SMS and is normally chaired by the Accountable Executive.						
5.3.8	The person (s) responsible for managing and maintaining the SMS is/are given appropriate status in the organization reflecting the importance of the safety role within the organization.						
5.3.9	Safety committees include stakeholders and significant contracted organizations.						
5.3.10	Safety committees are focused on safety issues and all attendees fully participate.						

5.3 Summary Comments

5.4 CO-ORDINATION OF EMERGENCY RESPONSE PLANNING

The organization shall ensure that an emergency response plan that provides for the orderly and efficient transition from normal to emergency operations and the return to normal operations is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its service.

EFFECTIVENESS is achieved when the organization has an emergency response plan that is appropriate to the organization and is regularly tested and updated including coordination with other organizations as appropriate.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
5.4.1	An emergency response plan (ERP) that reflects the size, nature and complexity of the operation has been developed and defines the procedures, roles, responsibilities and actions of the various organizations and key personnel.						
5.4.2	Key personnel in an emergency have easy access to the ERP at all times.						
5.4.3	The organization has a process to distribute the ERP procedures and to communicate the content to all personnel.						
5.4.4	The ERP is periodically tested for the adequacy of the plan and the results reviewed to improve its effectiveness.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
5.4.1	The organization has Memorandums of Understanding (MoUs) or agreements with other organizations for mutual aid and the provision of emergency						

	services.						
5.4.2	The organization has implemented Critical Incident Stress Management for its Personnel.						

5.4 Summary Comments

5.5 SMS DOCUMENTATION

The organization shall develop and maintain SMS documentation describing the safety policy and objectives, the SMS requirements, the SMS processes and procedures, the accountabilities, responsibilities and authorities for processes and procedures, and the SMS outputs. The organization may incorporate the SMS documentation into its existing organization documentation, or may develop and maintain a safety management system manual (SMSM) to communicate its approach to the management of safety throughout the organization.

EFFECTIVENESS is achieved when the organization has SMS documentation that describes their approach to the management of safety that is used throughout the organization and is regularly reviewed and updated. The documentation meets the safety objectives of the organization.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
5.5.1	There is documentation that describes the safety management system and the interrelationships between all of its elements						
5.5.2	SMS documentation is regularly reviewed and updated with appropriate version control in place						
5.5.3	SMS documentation is readily available to all personnel						
5.5.4	The SMS documentation details and references the means for the storage of other SMS related records						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
5.5.5	Safety management processes are integrated into existing organizational manuals						
5.5.6	The organization has analyzed and uses the most appropriate medium for the delivery of documentation at both the corporate and operational levels						

5.5 Summary Comments

6. SAFETY RISK MANAGEMENT

6.1 HAZARD IDENTIFICATION

The organization shall develop and maintain a formal process that ensures that aviation safety hazards are identified. This should include the investigation of incidents and accidents to identify potential hazards. Hazard identification shall be based on a combination of reactive, proactive and predictive methods of safety data collection.

EFFECTIVENESS is achieved when aviation safety hazards are being identified and reported throughout the organization. Hazards are captured in a hazard register and assessed in a systematic and timely manner.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
6.1.1	The organization has a reporting system to captures errors, hazards and near misses that is simple to use and accessible to all personnel.						
6.1.2	The organization has proactively identified all the major hazards and assessed the risks related to its current activities.						
6.1.3	The safety reporting system provides feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organization.						
6.1.4	Safety investigations are carried out to identify underlying causes and potential hazards for existing and future operations.						
6.1.5	Safety reports are acted on in a timely manner.						
6.1.6	Hazard identification is an ongoing process and involves all key personnel and appropriate stakeholders.						

6.1.7	Personnel responsible for investigating reports are trained in investigation techniques.						
6.1.8	Investigations establish causal/contributing factors (why it happened, not just what happened).						
6.1.9	Personnel express confidence and trust in the organizations reporting policy and process.						
6.1.10	The hazards identified are documented and kept available for future reference.						
6.1.11	The organization uses the results of investigation of incidents and accidents as a source for hazard identification in the system.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
6.1.12	There is an active reporting system indicated by reporting levels of more than, on average, 1 report per person per year.						
6.1.13	Safety Reports include the reporter's own errors and events that the reporter would not normally report (events where no-one was watching).						
6.1.14	The reporting system empowers personnel to propose preventative and corrective actions.						
6.1.15	There is evidence that the reporting system is actively used throughout the entire organization (in each department and in each location).						
6.1.16	The reporting system is available to contracted organizations and customers to make reports.						
6.1.17	There is a process in place to analyze reports and hazard logs to look for trends and gain useable management information.						

6.1 Summary Comments

6.2 RISK ASSESSMENT AND MITIGATION

The organization shall develop and maintain formal process that ensures analysis, assessment and control of safety risks in operations to an acceptable level.

EFFECTIVENESS is achieved when there is a formal process that ensures analysis, assessment and control of the safety risks in operations to an acceptable level.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
6.2.1	There is a structured process for the management of risk that includes the assessment of risk associated with identified hazards, expressed in terms of severity and probability.						
6.2.2	There are criteria for evaluating the level of risk the organization is willing to accept.						
6.2.3	The organization has risk control strategies that include hazard elimination, risk control, risk avoidance, risk acceptance, risk mitigation, and where applicable an action plan.						
6.2.4	Mitigating actions resulting from the risk assessment, including timelines and allocation of responsibilities are documented.						
6.2.5	Risk management is routinely applied in decision making processes.						
6.2.6	Effective and robust mitigations and controls are implemented.						
6.2.7	Risk assessments and risk ratings are appropriately justified.						
6.2.8	Senior management has visibility of medium and high risk hazards and their mitigation and controls.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
6.2.9	There is evidence that risks are being managed to as low as reasonably practical.						
6.2.10	There is evidence that risks are being managed to as low as reasonably practical.						
6.2.11	The risk management processes are reviewed and improved on a periodic basis.						

6.2 Summary Comments

7. SAFETY ASSURANCE

7.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT

The organization shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risks controls. The safety performance of the organization shall be verified in reference to the safety performance indicators and safety performance targets of the SMS.

EFFECTIVENESS is achieved when the organization has developed a series of safety performance indicators that are appropriate to the type of operation. There is a means to measure and monitor trends and take appropriate action when necessary

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
7.1.1	Safety objectives have been established.						
7.1.2	Safety performance indicators have been defined, promulgated and are being monitored and analyzed for trends.						
7.1.3	Risk mitigations and controls are being verified/audited to confirm they are working and effective.						
7.1.4	Safety audits are carried out that focus on the safety performance of the organization and its services and assess normal operations.						
7.1.5	Safety objectives and performance indicators are reviewed and updated periodically.						
7.1.6	Safety objectives and targets are specific, measurable, agreed to, relevant and time-based.						
7.1.7	Information obtained from safety assurance and compliance monitoring activities feeds back into the safety risk management process.						
7.1.8	Safety assurance will monitor the effectiveness of risk controls including those applied by						

	contracted organizations.					
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Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
7.1.9	The organization is monitoring its current, future and third party safety risks and is taking action to address unacceptable safety risks.						
7.1.10	When establishing and reviewing objectives and performance indicators, the organization considers:- hazards and risks; financial, operational and business requirements; view of interested parties.						
7.1.11	Safety objectives and performance indicators encompass all areas of the organization.						
7.1.12	Performance measurements have been defined for serious safety risks identified on the safety risk profile.						
7.1.13	Personnel at all levels are aware of the safety performance measurements in their areas of responsibility and the results of performance measurements are transmitted to them.						
7.1.14	Safety performance indicators are linked to the organization's safety objectives, and State SPIs are considered where appropriate.						
7.1.15	The analysis and allocation of resources are based on outputs from the performance measurement.						

7.1 Summary Comments

7.2 THE MANAGEMENT OF CHANGE

The organization shall develop and maintain a formal process to identify changes within the organization and its operation, which may affect established processes and services, to describe the arrangements to ensure safety performance before implementing changes, and to eliminate or modify safety risk controls that are no longer needed to effective due to changes in the operational environment.

EFFECTIVENESS is achieved when the organization uses the safety risk management system to proactively assess all major changes to the organization and its operations.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
7.2.1	The organization has established a process and conducts formal hazard analyses and risk assessments for major operational changes, major organizational changes and changes in key personnel.						
7.2.2	Safety Case/Risk assessments are aviation safety focused						
7.2.3	Key stakeholders are involved in the change management process						
7.2.4	During the change management process previous risk assessments and existing hazards are reviewed for possible effect						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
7.2.5	Validation of the safety performance after organizational and operational changes have taken place to assure assumptions remain valid and the change was effective						
7.2.6	All organizational and operational changes are subject to the change management process						
7.2.7	Safety accountabilities, authorities and responsibilities are reviewed as part of the change.						

7.2 Summary Comments

7.3 CONTINUOUS IMPROVEMENT OF THE SMS

The organization shall develop and maintain a formal process to identify the causes of substandard performance of the SMS, determine the implications of substandard performance of the SMS, determine substandard performance in operations, and eliminate or mitigate such causes.

EFFECTIVENESS is achieved when the organization routinely monitors the SMS performance to identify potential areas of improvement and the outcomes of this process lead to improvements to the safety management system.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
7.3.1	The Safety Committee has the necessary authority to make decisions related to the improvement and effectiveness of the SMS						
7.3.2	The SMS is periodically reviewed for improvements in safety performance						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
7.3.3	There is evidence of lessons learnt being incorporated into the policy and procedures.						
7.3.4	The organization benchmarks its SMS against other organizations and is an active promoter of SMS within the aviation industry.						

7.3.5	Best practice is sought and embraced						
7.3.6	Surveys and assessments of organizational culture are carried out regularly and acted upon						
7.3.7	For safety related services the organization requires contracted organizations not required by regulations to have an SMS						
7.3.8	Contracted organizations have the ability to participate and share information in the SMS						

7.3 Summary Comments

8. SAFETY PROMOTION

8.1 TRAINING AND EDUCATION

The organization shall develop and maintain a safety training program that ensures that personnel are trained and competent to perform the SMS duties. The scope of the safety training shall be appropriate to each individual's involvement in the SMS.

EFFECTIVENESS is achieved when all personnel are trained and competent to perform their SMS related duties and the training program is monitored for its effectiveness and updated.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
8.1.1	There is a documented process to identify Safety Management training requirements so that personnel are competent to perform their duties.						
8.1.2	There is a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training.						
8.1.3	There is a process that evaluates the individual's competence and takes appropriate remedial action when necessary.						
8.1.4	Training includes initial and recurrent training.						
8.1.5	A training record is maintained for all personnel trained.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
8.1.6	Training includes human and organizational factors including non technical skills with the intent of reducing human error.						
8.1.7	Training requirements are documented for each area of activity within the organization,						

	including areas where training requirements are not defined by regulations.						
8.1.8	A training need analysis is carried out for all personnel and is regularly reviewed.						
8.1.9	Training is provided for personnel working for contracted organizations related to the operation.						
8.1.10	Personnel have a mechanism to request additional SMS training in relation to their role in SMS.						
8.1.11	Management recognizes and uses informal opportunities to instruct all personnel on safety management.						
8.1.12	Training includes attendance at symposiums and industry conferences						
8.1.13	Training exercises and methods for all personnel are kept current to reflect new techniques, technologies, results of investigations, corrective actions and regulatory changes						

8.1 Summary Comments

8.2 SAFETY COMMUNICATION

The organization shall develop and maintain formal means for safety communication that ensures that all personnel are fully aware of the SMS, conveys safety critical information, and explains why particular safety actions are taken and why safety procedures are introduced or changed.

EFFECTIVENESS is achieved when all personnel are aware of the SMS, safety critical information and their role in respect of aviation safety.

INDICATORS OF COMPLIANCE + PERFORMANCE		P	S	O	E	How it is Achieved	Verification
8.2.1	Safety plans and strategies are communicated throughout the organization to all personnel.						
8.2.2	Significant events and investigation outcomes associated with the organization are communicated to all personnel, including contracted organisations where appropriate.						

Best Practice Indicators		P	S	O	E	How it is Achieved	Verification
8.2.3	There is a safety communication strategy that includes electronic communication, frequent meetings, SMS award systems, employee recognition system, SMS bulletins etc.						
8.2.4	Significant events and investigation outcomes from external sources are communicated to all personnel including contracted organizations where appropriate.						
8.2.5	The effectiveness of safety communication is routinely assessed and the strategy revised						

	as required.						
8.2.6	Safety-related information is proactively shared with other parties.						

8.2 Summary Comments