

## Annex O

### LFV:

#### ***Safety responsibilities and roles***

*The Director General is the Accountable Manager under Regulation (EU) 2017/373. The Accountable Manager is responsible for the certificate and has overall responsibility for safety.*

*Safety Manager is independent of production management and reports directly to the Director General on safety matters and is responsible for managing an effective SMS.*

*The respective department directors and unit heads/operational managers have delegated responsibility for safety in accordance with the above figure (D-2019-167256).*

*Details of safety responsibilities, roles involved and safety forums are set out in the LFV SMS (Safety Management System) Handbook (D-2010-009476-39-1), and the LFV Arbetsordning (D-2011-000721).*

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#### ***Safety policy and objectives***

LFV has an established *safetypolicy* ( D-2010-006747-2-1) which is available and published in VLS and on the LFV intranet.

The LFV safetyplan has been prepared to comply with LFV's *safetypolicy*. LFV's aviation safety goals are based on both international and national regulations and plans.

The LFV safetyplan is:

- Safety Manager's business-specific plan for verifying the effectiveness of the safety management system (SMS).
- LFV's description of safety goals and how the operation measures safety.
- LFV's description of the activities carried out to continuously improve flight safety.

The safetyplan is revised annually and is a description of how LFV, based on the safety goals, continuously measures and monitors safety in its operations.

The safetyplan has been prepared to meet *LFV's safety policy (D-2010-006747-2-1)* and safety goals, and is based on the principles of:

- Check that the functional system for each ATS/technical system is safe in relation to the changes being implemented.
- Checking that the number of incidents occurring in the business is in an acceptable relationship to the traffic volume being handled.
- Check that the SMS is effective in its ability to ensure that LFV's contribution to the risk of aircraft accidents is minimized as far as reasonably possible.

The safetyplan describes the overall safety reporting that is carried out to disseminate information about the current safety status.

The safetyplan constitutes a strategic direction for the operations' planning of measures and activities to continuously improve flight safety, and thereby ensure an effective and appropriate SMS.

The safetyplan is a tool for the work carried out in the operation – all managers and employees have a joint and individual responsibility to continuously ensure flight safety.

The Safetyplan complements LFV's operational plan in terms of its foundations for safety (LFV's operational plan is established after the Safetyplan).

The Accountable Manager (Director General) approves the safetyplan.

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### ***Safety risk management***

*LFV continuously works to identify and counter aviation safety risks through the Incident Reporting Process/ANS-DA (D-2016-059791) and the Aviation Safety Oversight Procedure (D-2017-095843).*

*Continuous information collection is carried out through monitoring of published information, safety announcements, courses and seminars, etc. from regulatory bodies and interest organizations such as ICAO, EASA, TS, Eurocontrol, CANSO, and through the operation's other international commitments as participants in various forums and initiatives within ATM. Reporting from the external environment monitoring is processed by SAG and, if necessary, to SRB, for assessment of possible measures to be taken within LFV.*

*The regulatory management process (D-2017-110632) reports on how external environment monitoring is carried out from a regulatory monitoring perspective for LFV's operations.*

*LFV works actively to identify, follow up and manage aviation safety risks.*

*Activities in 2025 to support aviation safety risk management:*

- a) Director En Route and Director Operations shall analyze and determine possible activities to minimize separation underruns in*

*order to achieve the SMI sub-goal in chapter 3.3. – The SMI focus area analysis (listed as no. 1 in the table in chapter 4.1) is provided to support the work .*

- b) Director En Route and Director Operations shall analyze and determine possible activities to minimize flying without a transponder turned on.  
– To support the work, there is a focus area analysis no SSR, flying without a transponder (listed as no. 2 in the table in chapter 4.1).*
- c) The Director of Operations shall analyze and determine possible activities to minimize runway incursions in order to achieve the RWYI sub-goal in chapter 3.3. – The RWYI focus area analysis (listed as no. 3 in the table in chapter 4.1) is provided to support the work .*
- d) Director En Route and Director Operations shall analyze and develop possible activities to minimize unauthorized flights with unmanned aircraft.  
– To support the work, there is a focus area analysis Unmanned aircraft (listed as no. 4 in the table in chapter 4.1).*
- e) The Director of Systems and Development shall analyze and develop possible activities to minimize technical contributions (within his own administrative area) to aviation safety incidents.  
– To support the work, there is a focus area analysis Technical aviation safety incidents (listed as no. 5 in the table, chapter 4.1).*
- f) Director En Route and Director Operations shall analyze and develop possible activities to minimize Human Factors' contribution to aviation safety incidents.  
– The work is supported by the Human Factors focus area analysis (listed no. 6 in the table in chapter 4.1).*
- g) Director En Route and Director Operations shall analyze and develop possible activities to minimize incorrect activation/deactivation of R/D areas.  
– To support the work, there is a focus area analysis R/D areas activation (listed as no. 7 in the table in chapter 4.1).*
- h) The Director of Shared Services (GT) shall (together with commissioning operations) review the possibility of developing focus area analyses regarding qualitative analyses and concrete recommendations to provide increased added value in operations.*

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**Safety assurance**

*Proactive work means for the safetyplan that all information in the form of analyses (e.g. investigations, reports, identification of trends, audits, supervision, information from regulators, industry and organizations ↯) that comes to the operational departments and/or SAG and SRB is evaluated based on how a positive impact on safety or the efficiency of the management systems can be achieved.*

*The main processes for safety assurance Is Change management process (including SA/SSA process), and the Occurrence Reporting process.*

*LFV will work proactively to continuously maintain good safety and support the management of safety assurance.*

*Activities in 2025 to support aviation safety management:*

- a) The Director of Shared Services shall analyze and determine possible activities for points 1–3 above, chapter 5.3, to achieve the interim goals.*
- b) Activities within Chapter 6 are achieved.*
- c) Dir. Operations, Dir. En Route and Dir. SoU shall try to identify precursors (precursors to an event) in order to identify what preventive measures can be taken. This activity is initiated in order to, if possible, create relevant and measurable indicators in the long term.*
- d) Safety Manager with support from process manager The change management process shall investigate the possibility of developing methodology within the functional system with the aim of reducing the number of change notifications to the Swedish Transport Agency and reducing lead times for change requests.*

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### ***Safety promotion and safety culture***

*Safety culture within the operation is characterized by the attitudes and perceptions, values and norms that exist among individuals, groups and the operation as a whole regarding how aviation -safety is viewed and what an individual employee contributes in this perspective. A strong aviation safety culture is an important foundation within all of LFV's operations.*

*LFV works for an active reporting culture and we always write incident reports when an event/incident occurs.*

*Activities in 2025 to support **Reporting culture**:*

- a) The Director of Shared Services shall ensure that the conditions are provided to achieve the interim objectives in Chapter 5.3.*
- b) The new incident reporting system project will ensure that measures (training & information) are implemented in connection with the implementation of the new incident reporting system TOKAI, with*

*the aim of maintaining a good willingness to report throughout the organization.*

- c) GT Unit Aviation Safety will analyze the possibility of comparing reporting propensity with other ANSPs in an external perspective within the framework of the safety culture measurement in 2023 and, after implementation of TOKAI, investigate the possibilities of accessing data/statistics from other ANSPs.*
- d) Director JKFM, in his capacity as the owner of the event reporting system, shall ensure that the requirements for ECCAIRS2 are met through the implementation of TOKAI in the operation as a replacement for the current Synergi.*

**Activities in 2025 to support *Just culture*:**

*LFV shall continuously monitor the safety and fairness culture, which is linked both to the requirements in the regulations and to LFV's culture in general.*

- a) The Safety Manager, with the support of the Just Culture coordinator, will ensure that material is produced for the purpose of the operation carrying out group exercises within Just Culture within each organization. This is done based on the training in justice and safety culture in Luvit that will be introduced in the fall of 2024.*
- b) Each operation shall, as necessary, initiate action plans and activities based on the results of the Safety Culture Survey and its workshops conducted in the fall of 2024.*
- c) The Safety Manager will plan a new safety culture measurement in 2026.*

**Activities in 2025 to support *Learning culture*:**

*LFV supports a learning culture by learning from its own and others' experiences (both mistakes and errors as well as good experiences/best practices in accordance with Safety II) and disseminating these within the organization to continuously improve operations.*

- a) The ANS DA process team will continue to develop methodology for investigations to create additional added value and lessons learned for the receiving operating organization.*
- b) The ANS-DA process team will (after the implementation of TOKAI) during the period 2025-2026 work to include the SOAM chart (Systemic Occurrence Analysis Methodology) in investigations in order to visualize causal relationships.*

- c) *The change management process team and FSB shall continue to develop and offer training opportunities according to activities within 6.6.1.*
- d) *The GT Unit Aviation Safety will monitor trends and, based on needs, initiate targeted internal information and communication, such as Safety Observations.*

*Activities in 2025 to support **Safety commitment**:*

*Maintaining aviation safety is a top priority for managers, leaders and employees. All departments/units with delegated aviation safety responsibility should have aviation safety as an integral part of the agenda within their respective decision-making forums, this to demonstrate that aviation safety is included as an active part of the decision-making process.*

- a) *Management's ongoing commitment to aviation safety issues will be ensured by LFV's various departments prioritizing continued active participation in aviation safety forums.*
- b) *The Safety Manager will, together with the operations, develop an annual recurring theme day for Aviation Safety.*

*Activities in 2025 to support **Communication**:*

*By being responsive and striving for proactive, transparent and clear communication, we create trust both internally and externally. Access to relevant and necessary aviation safety information shall be provided and disseminated to the greatest extent possible.*

- a) *The Safety Manager shall ensure that the internal communication plan Aviation Safety 2024 (D-2024-361777) is replaced with the communication plan 2025 and that it is followed up continuously during the year.*
- b) *The Safety Manager shall ensure that continuous meetings (approximately once a month) with communication take place to ensure primarily internal dissemination of relevant aviation safety information and that the aviation safety communication activity plan (D-2024-364778) is continuously updated/adjusted.*
- c) *The LFV magazine CQ Safety disseminates experiences from non-conformity reporting and provides information about ongoing aviation safety work and campaigns, and thus fulfills an important function within the operation. GT Unit Aviation Safety shall ensure the publication of at least two issues annually.*

*Activities in 2025 to support **Resources and competences**:*

*LFV managers and leaders must ensure that there are always resources, expertise and conditions to deliver satisfactory flight safety.*

- a) The Safety Manager shall follow up on the fact that the safety meeting between LFV and Swedavia takes place 2-4 times/year in accordance with the established Working Procedure for the Safety meeting between LFV and Swedavia (D-2022-290935) .*
- b) The Safety Manager shall collaborate within aviation safety with other ANSPs with the aim of sharing best practice through meetings or other exchange of experience.*
- c) The change management process team will develop training materials with the goal of creating shortened refresher training (possibly in Luvit) as a complement to basic training.*
- d) The FSB/SAF process team will review the possibility of developing training for refresher training purposes (possibly within Luvit)*
- e) The FSB/SAF process team will clarify the competency requirements for qualification as an aviation safety assessor, in order to improve quality and maintain a more uniform level within the framework of LFV FSB work.*
- f) The change management process team should review the possibility of clarifying competency requirements for change owners and change managers, in order to improve quality and maintain a more uniform level.*

**Activities in 2025 to support *Systematic Safety work*:**

*LFV aviation safety work is carried out in a structured, systematic and traceable manner.*

- a) In 2023, the Director of Systems and Development has carried out a feasibility study "management of safety-critical software" (D-2023-329450) with the aim of LFV subsequently being able to develop processes/routines to handle requirements regarding software safety assurance, implementation schedule not defined, the ambition is for this to be initiated in 2024 and the goal to be implemented in 2025.*
- b) LFV shall continuously monitor the safety and fairness culture, which is linked to both the requirements in the regulations and to LFV's culture in general. The Safety Manager is responsible for conducting a safety culture measurement every 3 years (next time in 2026).*
- c) The Safety Manager and Compliance Monitoring Manager must clarify the need for follow-up certified services within ongoing*

*projects such as VLS 2.0, tools for strategic management and feasibility studies for Compliance tools.*

- d) The FSB/SAF process team will clarify and develop a methodology for referral and review of FSB/SAF.*
- e) The FSB/SAF process team will clarify the handling of Human Factors within the FSB process.*
- f) The FSB/SAF process team will develop support (e.g. document template and methodology) for how overarching safety arguments should be developed and documented in the event of multi-actor change.*

#### **ACR:**

What does ACR plan to do in the coming year (what planned activities are there)? ACR has compiled, at a relatively high level, the activities that will be carried out in 2025, within the areas listed below.

ACR is currently in the process of making changes to its management system. In the coming year, ACR will change large parts of its structure and, to some extent, clarify how we implement various activities within our certified services. In the last quarter, we have implemented about 30 new processes and procedures in our operations. This means that for a period, we will monitor and learn.

#### *Safety Policy and Objectives*

ACR has developed a new template for how our policies should be structured. This is to clarify what constitutes a policy, what is a statement (e.g., safety is our top priority), how we will achieve it, and what responsibilities our top management has regarding the policy.

We have developed a draft safety policy, which was presented and discussed during the latest ACR Days event. ACR will soon implement this, most likely as part of the ongoing review of the management system.

#### *Safety Risk Management*

ACR has just implemented revised procedures for handling changes, including safety assessments. The main changes are focused on working more with hazards (as opposed to causes, as ACR previously did) during change management and with fixed hazards. This change is primarily aimed at enabling the monitoring of the functional system (and implemented changes) throughout the lifespan of the different components of the functional system. ACR will monitor how these new governing documents



are received in the organization and whether adjustments/changes/clarifications need to be made for them to function effectively.

ACR has a collaboration with other providers, where we meet and exchange experiences regarding risk management. This has proven to be a valuable exchange of experiences, and in many cases, it has simplified and improved the coordination needed between organizations, for example, through multi-actor coordination and coordination around incidents. ACR will continue this collaboration in the coming year and may expand it to other areas beyond just safety.

#### *Safety Assurance*

ACR has revised its process for how we manage and monitor risks in operations during the past year. This process has just been implemented and will allow ACR to monitor risks in our operations in a more structured way. This includes risks (hazards) arising from implemented changes, as well as risks that exist locally and centrally in the delivery of our services (these risks do not necessarily stem from implemented changes but may also include local risks, such as snow clearing, airspace infringements, etc.). ACR will further develop how we follow up and monitor our certified services in the coming year.

ACR will also develop its collaboration with our airport customers for whom we provide contracted services. There will be a clearer description of how we will cooperate, who is responsible for what, etc. This is to ensure that both parties have the same expectations regarding their mutual responsibilities.

#### *Safety Promotion*

In 2025, ACR will conduct training for our staff on governing documentation. ACR will also focus on spreading experiences between our units.

#### *Safety Culture*

In May 2023, ACR conducted a survey on safety culture within the organization. ACR has been working with the results of this survey throughout 2023 and 2024 to further improve and develop our safety culture. The survey indicated, among other things, that information sharing with operational staff needs to improve. ACR has conducted two workshops to gather feedback on perceived gaps and how information dissemination can be improved. During the past year, ACR has worked on spreading information through the management structure down to grassroots level, as well as creating written communication such as newsletters (published three

to four times per year), providing more information from central sources on the intranet, etc.

ACR will continue to work on improving communication channels within the organization and determine which information needs to be shared and in what ways to reach users/resources.

ACR will conduct a new survey on safety culture within the organization in 2025. Similar questions/forms will likely be used, possibly complemented by follow-up interviews.

#### *Summary*

Much of ACR's activities in the coming year will focus on the “new” management system that is being developed and the training efforts that will need to be implemented both within ACR and to some extent with our contracted partners. ACR will also work to improve the safety culture within the organization, primarily by spreading more information (which employees have indicated is lacking) and by building trust and solidarity between units and headquarters, while being more visible in the operations. In the work with the management system, "best practices" from other organizations will be applied. ACR will clarify and review the activities we are already performing, making them more risk-based to ensure activities are conducted in the "right" places.

#### **SDATS:**

As of the EoSM reporting of 2023 SDATS have achieved the RP3 maturity targets. Being a small ATM/ANS provider on a competitive market we encountered some difficulties achieving the higher maturity levels due to our size and relation with our competitors in the past. One important measure we undertook where to formalize the collaboration between the us and the other ATC providers in Sweden. This has been, and will continue to be important for us to allow us to exchange experiences with regards to safety assurance and safety promotion.

We do honestly believe that we together with our competitors have achieved an important milestone but at the same time that were yet to see the full benefit of this collaboration.

We are aware that the criteria's for the RP4 maturity levels will change and at the same time where we are facing an expansion of our service provision where we insource technical maintenance. Thus our priority will be to ensure that the achievements made will be implemented in the entire

organization, thereafter we intend to continue to elaborate on the collaboration. We think continuity is important here.

In the competitive Swedish market there is a lot of challenges with several organisations having their share of the market. One major part to become more mature is to find, develop and cherish colaboration and exchange within the market and especially between organsiations, something that SDATS strive to achieve.

### **Safety Policy and Objectives**

As a provider on a competitive market we have many dependencies towards different stakeholders in ATM, one very important aspect in that environment is the promulgation of policies and objective over organizational boundaries has been challenging in a young competitive market. As the market is maturing we have developed our collaboration with other stakeholders including potential future and current competitors. We have been, and will continue to be an advocate for putting safety in the front seat. This includes creating and continue to develop the necessary forums between organizations and stakeholders, as well as formalizing those agreements.

We will also continue to develop contingency procedures and business continuity procedures.

### **Safety Risk Management**

We continuously strive to improve our assessment process. We have implemented an approach to identify risk to the airspace users and “third party” on what can be described as risk at the edge of the functional system. Simplified where traditionally identified risks may now be considered causes to a risk. And where string emphasis is on identifying the risk for the airspace user.

We employ a model where the risk database for all services we provide are maintained throughout the life of the functional system.

We strive to include specialists (f.i. human factors specialists) in our change management procedures as well as in steady state as a mean to monitor the performance of our service provision.

We will seek to collaborate with manufacturing industry (DPOs) as well as other service providers sharing commonalities, f.i. same back-bone infrastructure or ATM systems. We have and will continue to develop the collaboration with research institutes and academic research. Striving to encourage that collaboration supporting development of independent

academic expertise in various areas relevant to our provision of service. F.i. Human Performance.

We are facing the adaptation safety risk management with Information security risk management where the aim is and will remain to be an integral approach to safety and information security which we strongly believe to be the right approach in current times.

### **Safety Assurance**

We rely on the international forums f.i. Eurocontrol but for us as a small ATM/ANS provider we will seek to develop our collaboration for sharing experience with our competitors who also provide their service under similar conditions to us, with the aim to share experiences and best practices. For us this is the single most important factor to improve our maturity wrt Safety Assurance.

### **Safety Promotion**

We strive to make safety top of mind and an integrated part of our communication. We strive to not provide a periodic safety bulletin, we aim to make safety an integral part of the regular periodic bulletin. Which for us, will include the aspect of information security as well.

### **Safety Culture**

We have made significant efforts to make safety top of mind and an integral part of our service provision. To provide capacity and safety to an airspace is the key value of our service.

The next major step we foresee is to develop and amend the culture so that information security as well as safety permeates all aspects of day to day operations.

### **AFAB:**

- *Safety policy and objectives*

The organisation will set a review cycle process of the safety policy to ensure that the policy is relevant and appropriate furthermore we also aim to compare our policy with other ANSP's for both improvement and influence. All changes in policy will be handled with the appropriate regulation and communicated throughout the organisation.

- *Safety risk management*

The organisation risk management needs improvements to reach an even higher standards, we need to improve our risk monitors effectiveness, both in documentation and frequency and implement an early risk/hazard control in the change management process to early identify hazards so the right changes is made decisions is made early in the process.

- *Safety assurance*

The organisation has started a work in improvement of our reporting and investigation system, both to ensure the safety/security for the person reporting but also make sure of a just culture – this will influence both the culture and reporting system.

The change management process is undergoing a work to improve our process.

We will also implement a safety survey.

- *Safety promotion*

Our safety policy state clearly that safety is our highest priority, we need to communicate this in our meetings much clearer so all staff members have the possibility to ask questions and have discussions of the meaning of our policy.

We also need to assess the effectiveness of our communication regarding safety and safety issues.

A work has been set up to ensure that our meetings have a purpose and agenda, so the topic safety is implemented throughout the entire organisation.

- *Safety culture*

The organisation has started a work in improvement of our reporting and investigation system, both to ensure the safety/security for the person reporting but also make sure of a just culture. Change due to a finding in audit that addressed in an audit.

The roles and responsibility in the system has been set up.

We also will strengthen our organisation we additional staff with to address our organisations responsibility and accountability in in the field of HR.