

**Appendix 2 - GUIDANCE ON SMS GAP ANALYSIS AND IMPLEMENTATION PLAN**

**1 Initial Gap Analysis Checklist (Table 1)**

The initial gap analysis questions checklist (Table 1) that follows can be used as a template to conduct the first step of a SMS gap analysis. This format with its overall “Yes/ No/ Partial” response will provide an initial indication of the broad scope of gaps and hence overall workload to be expected. The questionnaire may be adjusted to suit the needs of the organization and the nature of the product or service provided. This initial information should be useful to senior management in anticipating the scale of the SMS implementation effort and hence the resources to be provided (This initial checklist would need to be followed up by an appropriate implementation plan per Table 2 & 3).

A “Yes” answer indicates that the organization meets or exceeds the expectation of the question concerned. A “No” answer indicates a substantial gap in the existing system with respect to the question’s expectation. A “Partial” answer indicates that further enhancement or development work is required to an existing process in order to meet the question’s expectations.

Note: SMM references within [ ] brackets contain guidance materials relevant to the Gap analysis question.

Table 1

No.	<i>Aspect to be analysed or question to be answered</i>	<i>Answer</i>	<i>Status of implementation</i>
<b>Component 1 — SAFETY POLICY AND OBJECTIVES</b>			
<b>Element 1.1 — Management commitment and responsibility</b>			
1	Is there a safety policy in place? [4.3.1; 4.5.2(a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Does the safety policy reflect senior management commitments regarding safety management? [4.3.1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	The Safety Policy is appropriate to the size, nature and complexity of the organization. [4.3.1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	The Safety Policy is relevant to aviation safety. [4.3.1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Is the safety policy signed by the Accountable Executive? [4.3.1; 4.5.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Is the safety policy communicated, with visible endorsement, throughout the [organization]? [4.5.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
7	Is the safety policy periodically reviewed to ensure it remains relevant and appropriate to the [organization]? [4.5.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 1.2 — Safety accountabilities</b>			
1	Has the [organization] identified an 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

No.	Aspect to be analysed or question to be answered	Answer	Status of implementation
	SMS? [4.5.1; 4.3.2]		
2	Does the Accountable Executive have full control of the financial and human resources required for the operations authorized to be conducted under the operations certificate? [4.3.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Does the Accountable Executive have final authority over all aviation activities of his organization? [4.3.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Has the organization identified and documented the safety accountabilities of management as well as operational personnel, with respect to the SMS? [4.3.2]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Is there a Safety Committee or Review board for the purpose of reviewing SMS and safety performance? [4.3.3 and App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Is the Safety Committee chaired by the Accountable Executive or by an appropriately assigned deputy, duly substantiated in the SMS manual? [4.3.3 and App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
7	Does the Safety Committee include relevant operational or departmental Heads as applicable? [4.3.3 and App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
8	Are there Safety Action Groups that work in conjunction with the Safety Committee? (large/ complex organizations as appropriate) [4.3.3 and App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 1.3 — Appointment of key safety personnel</b>			
1	Has the organization appointed a qualified person to manage and oversee the day-to-day operation of the SMS? [4.5.1; 4.3.3; App 1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Does the qualified person have direct access or reporting to the Accountable Executive concerning the implementation & operation of the SMS? [4.3.3; App 1, 6.1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	The Manager responsible for administering the SMS does not hold other responsibilities that may conflict or impair his role as SMS manager. [App 1, 6.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	The SMS Manager is a senior management position not lower than or subservient to other operational or production positions [App1, 6.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 1.4 — Coordination of emergency response planning</b>			
1	Does the [organization] have an emergency response/contingency plan appropriate to the size, nature and complexity of the organization? [App 4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Does the Emergency/ Contingency plan address all possible or likely emergency/ crisis scenarios relating to the organization's aviation product or service deliveries? [App 4, 4(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Does the ERP include procedures for the continuing safe production, delivery or support of its aviation products or services during such emergencies or contingencies? [App 4, 4(e)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is there a plan and record for drills or exercises with respect to the ERP? [App 4, 5c]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Does the ERP address necessary coordination of its emergency response/contingency procedures with the emergency/response contingency	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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	procedures of other organizations where applicable? [App 4, 4(d)]	<input type="checkbox"/> Partial	
6	Does the [organization] have a process to distribute and communicate the ERP to all relevant personnel, including relevant external organizations? [App 4, 5(a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
7	Is there a procedure for periodic review of the ERP to ensure its continuing relevance & effectiveness? [App 4, 5(d)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 1.5 — SMS documentation</b>			
1	There is a top level SMS summary or exposition Document which is approved by the Accountable Manager and accepted by the CAA. [4.3.5]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Does the SMS Documentation address the organization's SMS and its associated components and elements? [4.3.5; 4.4.1; App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Is the organization's SMS framework in alignment to the regulatory SMS framework? [4.3.5; 4.4.1; App 3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Does the organization maintain a record of relevant supporting documentation pertinent to the implementation and operation of the SMS? [4.3.5; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Does the organization have a SMS implementation plan to establish its SMS implementation process, including specific tasks and their relevant implementation milestones? [4.4.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Does the SMS implementation plan address the coordination between the service provider's SMS and the SMS of external organizations where applicable? [4.4.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
7	Is the SMS implementation plan endorsed by the Accountable Executive? [4.5.1; 4.4.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Component 2 — SAFETY RISK MANAGEMENT</b>			
<b>Element 2.1 — Hazard identification</b>			
1	There is a process for voluntary hazards/ threats reporting by all employees. [4.5.3(a); 4.3.6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Is the voluntary hazard/ threats reporting simple, available to all personnel involved in safety-related duties and commensurate with the size of the service provider? 4.3.6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Does the [organization's] SDCPS include procedures for incident/ accident reporting by operational or production personnel? [4.3.8; 4.5.3; Xref chpt 3, App 12]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is incident/ accident reporting simple, accessible to all personnel involved in safety-related duties and commensurate with the size of the service provider? [4.5.3; 4.3.8]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Does the [organization] have procedures for investigation of all reported incident/ accidents?. [4.5.3; 4.3.8]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Are there procedures to ensure that hazards/ threats identified or uncovered during incident/ accident investigation processes are appropriately accounted for and integrated into the organization's hazard collection and risk mitigation procedure? [1.12.2; 1.12.3; 4.3.6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

<i>No.</i>	<i>Aspect to be analysed or question to be answered</i>	<i>Answer</i>	<i>Status of implementation</i>
7	Are there procedures to review hazards/ threats from relevant industry reports for follow up actions or risk evaluation where applicable? [1.12.2; 1.12.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

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<b>Element 2.2 — Safety risk assessment and mitigation</b>			
1	Is there a documented Hazard Identification and Risk Mitigation (HIRM) procedure involving the use of objective risk analysis tools. [1.12; 1.14; 4.3.7]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Is the risk assessment reports approved by departmental managers or higher level where appropriate? [4.3.7; 1.15.1]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Is there a procedure for periodic review of existing risk mitigation records? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is there a procedure to account for mitigation actions whenever unacceptable risk levels are identified? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Is there a procedure to prioritise identified hazards for risk mitigation actions? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Is there a program for systematic and progressive HIRM performance of all aviation safety-related operations/ processes/ facilities/ equipment as identified by the organization? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Component 3 — SAFETY ASSURANCE</b>			
<b>Element 3.1 — Safety performance monitoring and measurement</b>			
1	Are there identified safety performance indicators for measuring & monitoring safety performance of the organization's aviation activities? [4.5.3; 4.3.8; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Are safety performance indicators relevant to the organization's safety policy as well as management's high level safety objectives/ goals? [4.5.3; 4.3.8; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Do the safety performance indicators include alert/ target settings to define unacceptable performance regions and planned improvement goals? [4.5.3; 4.3.8; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is the setting of alert levels or out of control criteria based on objective safety metrics principles? [4.3.8; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Do the safety performance indicators include quantitative monitoring of high consequence safety outcomes (eg accident & serious incident rates) as well as lower consequence events (eg rate of non compliance, deviations)? [4.3.8; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	Are safety performance indicators and their associated performance settings developed in consultation with, and subject to the Aviation Authority's agreement? [4.5.3; 4.3.8]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
7	Is there a procedure for corrective or follow up action to be taken when targets are not achieved and alert levels are exceeded/ breached? [4.4.5]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
8	Are the safety performance indicators periodically reviewed? [4.4.5; App 6]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 3.2 — The management of change</b>			
1	Is there a procedure for review of relevant existing aviation safety related facilities and equipment (including any HIRM records) whenever there are pertinent changes to those facilities or equipment? [4.3.9; 4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

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2	Is there a procedure for review of relevant existing aviation safety related operations and processes (including any HIRM records) whenever there are pertinent changes to those operations or processes? [4.3.9; 4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Is there a procedure for review of new aviation safety related operations and processes for hazards/ risks before they are commissioned? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is there a procedure for review of relevant existing facilities, equipment, operations or processes (including any HIRM records) whenever there are pertinent changes external to the organization such as regulatory/ industry standards, best practices or technology? [4.5.3]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 3.3 — Continuous improvement of the SMS</b>			
1	Is there a procedure for periodic internal audit/ assessment of the SMS? [4.3.10; 4.5.3; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Is there a current internal SMS audit/ assessment plan? [4.3.10; 4.5.3; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Does the SMS audit plan include the sampling of completed/ existing safety risk assessments? [4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Does the SMS audit plan include the sampling of safety performance indicators for data currency and their target/ alert settings performance? [4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
5	Does the SMS audit plan cover the SMS interface with sub-contractors or customers where applicable? [4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
6	There is a process for SMS audit/ assessment reports to be submitted or highlighted for the Accountable Manager's attention where appropriate. [4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Component 4 — SAFETY PROMOTION</b>			
<b>Element 4.1 — Training and education</b>			
1	Is there a program to provide SMS training/ familiarization to personnel involved in the implementation or operation of the SMS? [4.3.11; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	Has the Accountable Executive undergone appropriate SMS familiarisation, briefing or training? [4.3.11; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
3	Are personnel involved in conducting risk mitigation provided with appropriate risk management training or familiarisation? [4.3.11; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
4	Is there evidence of organization wide SMS education or awareness efforts? [4.3.11; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
<b>Element 4.2 — Safety communication</b>			
1	Does the organization participate in safety information sharing with relevant external industry product and service providers or organizations, including the relevant aviation regulatory organizations? [4.3.12; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	
2	There is evidence of a Safety (SMS) publication, circular or channel for communicating Safety (SMS) matters to employees. [4.3.12; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

No.	<i>Aspect to be analysed or question to be answered</i>	<i>Answer</i>	<i>Status of implementation</i>
3	Are the organization's SMS manual and related guidance materials accessible or disseminated to all relevant personnel? [4.3.12; 4.5.4]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partial	

## 2 Detailed SMS Gap Analysis & Implementation Tasks (Table 2)

The above Table 1 initial gap analysis checklist will now need to be followed up by a detailed "Required Tasks/ Actions" plan such as per Table 2 example below. This Table 2 will provide follow up analysis on details of the gaps and translating these into actual required tasks and sub-tasks in the specific context of the organization's processes and procedures. Each Task is accordingly assigned to appropriate individuals or groups for action. It is important that correlation of individual element/ task development to their descriptive placeholders in the SMS Document be provided for in this Table 2. This will trigger progressive updating of the draft SMS Document even as each element is being enhanced or implemented. (Initial element write-ups in SMS documents tend to be anticipatory rather than declaratory).

## 3 Actions/ Tasks Implementation Schedule (Table 3)

Table 3 may be a separate consolidation of all outstanding Actions/ Tasks or if preferred, be a continuation of Table 2 in the form of a spread sheet. This Table will show the milestones (Start-End dates) as scheduled for each Task/ Action. For a Phased implementation approach, these Tasks/Actions would need to be sorted according to its related element's Phase allocation. Refer to Phased Approach Section of this chapter for the phased prioritization of SMS elements as appropriate. Where it is anticipated that the actual number of Tasks/ Actions and their milestones are sufficiently voluminous and complex as to require utilising a project management software to management them, this may be done by using such as MS project/ Gantt chart as appropriate. Table 4 is an illustration of such a Gantt chart.