# Advisory Circular

# AC SMS-GPA/IMPL-01

# SMS Gap Analysis
# and
# Guidance on SMS Implementation Plan

Aerodrome & Air Navigation Safety Oversight Office (AANSOO)
Office of the Director General
Civil Aviation Authority of the Philippines
Old MIA Road, Pasay City, 1300

**Revision 1.0**

**June 2014**

Advisory Circulars (AC) are intended to provide recommendations and guidance to illustrate a means, but not necessarily the only means, of complying with regulatory requirements, or to explain certain regulatory requirements by providing interpretative and explanatory materials.

CAAP will generally accept that when the provisions of an Advisory Circular have been met, compliance with the relevant regulatory obligations has been satisfied.

Where an AC is referred to in a “Note” within regulatory documentation, the AC remains as guidance material.

ACs should always be read in conjunction with the referenced regulations.

**Advisory Circular AC SMS-GPA/IMPL-01**

# GUIDANCE ON SMS GAP ANALYSIS AND IMPLEMENTATION PLAN

## General

Civil Aviation Authority Advisory Circulars contain information about standards, practices, and procedures that the Director-General has found to be an acceptable means of compliance. An advisory circular is not intended to be the only means of compliance with a rule/regulation or requirement, and consideration will be given to other methods of compliance that may be presented to the Director General. When new standards, practices, or procedures are found to be acceptable they will be added to the appropriate Advisory Circular.

## Background

An SMS is a system to assure the safe operation of aircraft through effective management of safety risk. This system is designed to continuously improve safety by identifying hazards, collecting and analyzing data and continuously assessing safety risks. The SMS seeks to proactively contain or mitigate risks before they result in aviation accidents and incidents. It is a system that is commensurate with the organization's regulatory obligations and safety goals.

SMS is necessary for an aviation organization to identify hazards and manage safety risks encountered during the delivery of its products or services. An SMS includes key elements that are essential for hazard identification and safety risk management by ensuring that the necessary information is available, the appropriate tools are available for the organization's use, the tools are appropriate to the task, the tools are commensurate with the needs and constraints of the organization, and decisions are made based on full consideration of the safety risk.

An SMS implementation plan should be developed by concerned service providers/operators in consultation with the accountable executive and managers responsible for the delivery of products and services related to, or in support of, the safe operation of aircraft. Once completed, the accountable executive endorses the plan. The SMS implementation plan should include timelines and milestones consistent with the requirements identified in the gap analysis process, the size of the service provider and the complexity of its products or services. The plan should address coordination with external organizations or contractors where applicable. Full implementation of all components and elements of the SMS framework may take up to five years, depending on an organization's maturity and complexity.

A gap analysis compares the service provider's existing safety management processes and procedures with requirements contained in the SMS framework. Aviation service providers will have typically implemented various SMS functions due to their compliance with national regulations or adoption of industry best practices. The development of an SMS should build upon existing organizational structures and control systems. The gap analysis

facilitates development of an SMS implementation plan by identifying the gaps that must be addressed to fully implement an SMS. Once the gap analysis has been completed and fully documented, the resources and processes that have been identified as missing or inadequate will form the basis of the SMS implementation plan.

**References**

This Advisory Circular (AC) should be read in conjunction with:

- Philippine Civil Aviation Regulations (PCARs) Part 2, Personnel Licensing
- PCAR Part 5, Airworthiness
- PCAR Part 6, Approved maintenance Organizations
- PCAR Part 7, Instrument and Equipment
- PCAR Part 8, Operations (Aircraft)
- PCAR Part 13, Aircraft Accident and Incident Investigations
- PCAR for Aerodromes
- PCAR-ANS Part 1 – Aerodrome and ANS Safety Oversight and
- PCAR-ANS Part 11 - Air Traffic Service Providers.

These documents are available on the CAAP website at: www.caap.gov.ph. This AC may also refer to portions of the following:

- Manual of Standards (MOS) for Aerodromes
- ICAO Annex 1, Personnel Licensing
- ICAO Annex 6, Operation of Aircraft
- ICAO Annex 8, Airworthiness of Aircraft
- ICAO Annex 11, Air Traffic Service
- ICAO Annex 13, Aircraft Accident and Incident Investigation
- ICAO Annex 14, Aerodromes
- ICAO Annex 19, Safety Management Systems and State Safety Programme
- ICAO Doc 9859, Safety Management Systems Manual 3rd ed
- ICAO Doc 4444, PANS-ATM
- ICAO Doc 9870, Manual on the Prevention of Runway Incursion

**Purpose**

The Philippines, as signatory to the International Convention on Civil Aviation, adheres, to the extent practicable, to the ICAO Standards and Recommended Practices. The modern requirements for enhancing safety in civil aviation has brought into the fore the need for contracting States to develop, establish, and implement State Safety Programmes and for service providers to develop, establish, and implement Safety Management Systems.

This AC is intended to provide service providers and operators involved in civil aviation with guidance on the development of a Safety Management Systems manual in accordance with the State Safety Programme (SSP) for Philippine Aviation, relevant PCARs and PCAR-ANS, and ICAO international Standards and Recommended Practices (SARPs) contained in Annex 1 — Personnel Licensing, Annex 6 — Operation of Aircraft, Annex 8 — Airworthiness of Aircraft, Annex 11 — Air Traffic Services, Annex 13 — Aircraft

Accident and Incident Investigation, Annex 14 —Aerodromes, Annex 19 — Safety Management, and Doc 9859 – SMS Manual.

**Application/Applicability**

In the context of safety management, the term "service provider" or "product and service provider" refers to any organization providing aviation products and/or services. The term thus encompasses approved training organizations that are exposed to safety risks during the provision of their services, aircraft operators, approved maintenance organizations, organizations responsible for type design and/or manufacture of aircraft, air traffic service providers and certified aerodromes.

**Status of this AC**

ACs are numbered to reflect the regulatory basis, the serial number of the circular issued for that regulation and the revision status for that AC. In this case, the regulatory bases are Philippine Civil Aviation Regulations PCAR Part 2 - Personnel Licensing, PCAR Part 5 - Airworthiness, PCAR Part 6 - Approved Maintenance Organizations, PCAR Part 7 - Instrument and Equipment, PCAR Part 8 - Operations (Aircraft), PCAR Part 13 – Aircraft Accident and Incident Investigations, PCAR for Aerodromes, PCARS-ANS Part 1 – Aerodrome and ANS Safety Oversight and PCAR-ANS Part 11 - Air Traffic Services. This is the first issue of AC SMS-GPA/IMPL-01. It remains current until re-issued, withdrawn or superseded.

**Change Notice**
This is the initial issue.

**Copies of this AC**

The Regulatory Standards Divison of AANSOO makes ACs available to the public through the Internet. These ACs may be found through the CAAP home page (www.caap.gov.ph). A printed copy of this and other ACs can also be ordered from the Aerodrome and Air Navigation Safety Oversight Office (AANSOO), Civil Aviation Authority of the Philippines, MIA Road, Pasay City 1301, Telefax: (632) 8799-118 / 357.

**LT GEN WILLIAM K HOTCHKISS III AFP (Ret)**
Director General
Civil Aviation Authority of the Philippines

Date: _____

# ADVISORY CIRCULAR AC-SMS-GPA/IMPL-01

# SMS GAP ANALYSIS CHECKLIST AND GUIDANCE ON SMS IMPLEMENTATION PLAN

## 1. Objective

The objective of this guidance is to introduce an example of the four SMS implementation phases. The implementation of an SMS is a systematic process. Nevertheless, this process may be quite a challenging task depending on factors, such as the availability of guidance material and resources required for implementation, as well as the service provider's pre-existing knowledge of SMS processes and procedures.

The reasons for a phased approach to SMS implementation include:

a) the provision of a manageable series of steps to follow in implementing an SMS, including allocation of resources;

b) the need to allow implementation of SMS framework elements in various sequences, depending upon the results of each service provider's gap analysis;

c) the initial availability of data and analytic processes to support reactive, proactive and predictive safety management practices; and

d) the need for a methodical process to ensure effective and sustainable SMS implementation.

The phased approach recognizes that implementation of a fully mature SMS is a multi-year process. A phased implementation approach permits the SMS to become more robust as each implementation phase is completed. Fundamental safety management processes are completed before moving to successive phases involving processes of greater complexity.

Four implementation phases are proposed for an SMS. Each phase is associated with various elements (or sub-elements) as per the ICAO SMS framework. It is apparent that the particular configuration of elements in this guidance material is not meant to be absolute. Service providers may choose to make adjustments as may be deemed appropriate for the circumstances.

## 2. INITIAL GAP ANALYSIS CHECKLIST (TABLE A7-1)

2.1 The **initial** gap analysis checklist in Table A7-1 can be used as a template to conduct the **first step of an SMS gap analysis**. This format with its overall **Yes / No / Partial** responses 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 as per Tables A7-2 and A7-3.

2.2 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.— The references in square [ ] brackets refer to guidance material in the ICAO Doc 9859 relevant to the gap analysis question.*

**Table A7-1. Gap analysis checklist**

| *No.* | *Aspect to be analyzed or question to be answered* | *Answer* | *Status of implementation* |
|---|---|---|---|
| **Component 1 — SAFETY POLICY AND OBJECTIVES** | | | |
| **Element 1.1 — Management commitment and responsibility** | | | |
| 1.1-1 | Is there a safety policy in place?<br>[ 5.3.7 to 5.3.15; 5.5.3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.1-2 | Does the safety policy reflect senior management's commitment regarding safety management?<br>[5.3.7 to 5.3.15] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.1-3 | Is the safety policy appropriate to the size, nature and complexity of the organization?<br>[5.3.7 to 5.3.15] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.1-4 | Is the safety policy relevant to aviation safety?<br>[5.3.7 to 5.3.15] | ☐ Yes<br>☐ No<br>☐ Partial | |

| *No.* | *Aspect to be analyzed or question to be answered* | *Answer* | *Status of implementation* |
|---|---|---|---|
| 1.1-5 | Is the safety policy signed by the accountable executive?<br>[5.3.7 to 5.3.15; 5.5.3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.1-6 | Is the safety policy communicated, with visible endorsement, throughout the [Organization]?<br>[5.5.3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.1-7 | Is the safety policy periodically reviewed to ensure it remains relevant and appropriate to the [Organization]?<br>[5.5.3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 1.2 — Safety accountabilities** | | | |
| 1.2-1 | Has [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 SMS?<br>[5.3.16 to 5.3.26; 5.5.2] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-2 | 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?<br>[5.3.16 to 5.3.26] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-3 | Does the Accountable Executive have final authority over all aviation activities of his organization?<br>[5.3.16 to 5.3.26] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-4 | Has [Organization] identified and documented the safety accountabilities of management as well as operational personnel, with respect to the SMS?<br>[5.3.16 to 5.3.26] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-5 | Is there a safety committee or review board for the purpose of reviewing SMS and safety performance?<br>[5.3.27 to 5.3.33; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-6 | Is the safety committee chaired by the accountable executive or by an appropriately assigned deputy, duly substantiated in the SMS manual?<br>[5.3.27 to 5.3.33; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-7 | Does the safety committee include relevant operational or departmental heads as applicable?<br>[5.3.27 to 5.3.33; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.2-8 | Are there safety action groups that work in conjunction with the safety committee (especially for large/complex organizations)?<br>[5.3.27 to 5.3.33; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |

| *No.* | *Aspect to be analyzed or question to be* | *Answer* | *Status of* |
|---|---|---|---|
| **Element 1.3 — Appointment of key safety personnel** | | | |
| 1.3-1 | Has [Organization] appointed a qualified person to manage and oversee the day-to-day operation of the SMS?<br>[5.3.27 to 5.3.33; 5.5.2; Appendix 2] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.3-2 | Does the qualified person have direct access or reporting to the accountable executive concerning the implementation and operation of the SMS?<br>[5.3.27 to 5.3.33; 5.5.2; Appendix 2, 6.1] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.3-3 | Does the manager responsible for administering the SMS hold other responsibilities that may conflict or impair his role as SMS manager.<br>[Appendix 2, 6.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.3-4 | Is the SMS manager's position a senior management position not lower than or subservient to other operational or production positions<br>[Appendix 2, 6.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 1.4 — Coordination of emergency response planning** | | | |
| 1.4-1 | Does [Organization] have an emergency response/contingency plan appropriate to the size, nature and complexity of the organization?<br>[Appendix 3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.4-2 | Does the emergency/contingency plan address all possible or likely emergency/crisis scenarios relating to the organization's aviation product or service deliveries?<br>[Appendix 3, 4 f)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.4-3 | Does the ERP include procedures for the continuing safe production, delivery or support of its aviation products or services during such emergencies or contingencies?<br>[Appendix 3, 4 e)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.4-4 | Is there a plan and record for drills or exercises with respect to the ERP?<br>[Appendix 3, 5 c)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.4-5 | Does the ERP address the necessary coordination of its emergency response/contingency procedures with the emergency/response contingency procedures of other organizations where applicable?<br>[Appendix 3, 4 d)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.4-6 | Does [Organization] have a process to distribute and communicate the ERP to all relevant personnel, including relevant external organizations?<br>[Appendix 3, 5 d)] | ☐ Yes<br>☐ No<br>☐ Partial | |

| No. | Aspect to be analyzed or question to be answered | Answer | Status of implementation |
|---|---|---|---|
| 1.4-7 | Is there a procedure for periodic review of the ERP to ensure its continuing relevance and effectiveness?<br>[Appendix 3, 5 f)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 1.5 — SMS documentation** | | | |
| 1.5-1 | Is there a top-level SMS summary or exposition document which is approved by the accountable manager and accepted by the CAA?<br>[5.3.36 to 5.3.38] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-2 | Does the SMS documentation address the organization's SMS and its associated components and elements?<br>[5.3.36 to 5.3.38; 5.4.1; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-3 | Is [Organization] SMS framework in alignment with the regulatory SMS framework?<br>[5.3.36 to 5.3.38; 5.4.1; Appendix 4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-4 | Does [Organization] maintain a record of relevant supporting documentation pertinent to the implementation and operation of the SMS?<br>[5.3.36 to 5.3.38; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-5 | Does [Organization] have an SMS implementation plan to establish its SMS implementation process, including specific tasks and their relevant implementation milestones?<br>[5.4.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-6 | Does the SMS implementation plan address the coordination between the service provider's SMS and the SMS of external organizations where applicable?<br>[5.4.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 1.5-7 | Is the SMS implementation plan endorsed by the accountable executive?<br>[5.4.4; 5.5.2] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Component 2 — SAFETY RISK MANAGEMENT** | | | |
| **Element 2.1 — Hazard identification** | | | |
| 2.1-1 | Is there a process for voluntary hazards/threats reporting by all employees?<br>[5.3.42 to 5.3.52; 5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.1-2 | 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?<br>[5.3.42 to 5.3.52] | ☐ Yes<br>☐ No<br>☐ Partial | |

| *No.* | *Aspect to be analyzed or question to be answered* | *Answer* | *Status of implementation* |
|---|---|---|---|
| 2.1-3 | Does [Organization] SDCPS include procedures for incident/accident reporting by operational or production personnel?<br>[5.3.42 to 5.3.52; 5.5.4; Chapter 4, Appendix 3] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.1-4 | Is incident/accident reporting simple, accessible to all personnel involved in safety-related duties and commensurate with the size of the service provider?<br>[5.3.42 to 5.3.52; 5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.1-5 | Does [Organization] have procedures for investigation of all reported incident/accidents?.<br>[5.3.42 to 5.3.52; 5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.1-6 | 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?<br>[2.13.9; 5.3.50 f); 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.1-7 | Are there procedures to review hazards/threats from relevant industry reports for follow-up actions or risk evaluation where applicable?<br>[5.3.5.1] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 2.2 — Safety risk assessment and mitigation** | | | |
| 2.2-1 | Is there a documented hazard identification and risk mitigation (HIRM) procedure involving the use of objective risk analysis tools?<br>[2.13; 2.14; 5.3.53 to 5.3.61] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.2-2 | Is the risk assessment reports approved by departmental managers or at a higher level where appropriate?<br>[2.15.5; 5.3.53 to 5.3.61] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.2-3 | Is there a procedure for periodic review of existing risk mitigation records?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.2-4 | Is there a procedure to account for mitigation actions whenever unacceptable risk levels are identified?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.2-5 | Is there a procedure to prioritize identified hazards for risk mitigation actions?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 2.2-6 | Is there a programme for systematic and progressive review of all aviation safety-related operations, processes, facilities and equipment subject to the HIRM process as identified by the organization?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |

| *No.* | *Aspect to be analyzed or question to be answered* | *Answer* | *Status of implementation* |
|---|---|---|---|
| **Component 3 — SAFETY ASSURANCE** | | | |
| **Element 3.1 — Safety performance monitoring and measurement** | | | |
| 3.1-1 | Are there identified safety performance indicators for measuring and monitoring the safety performance of the organization's aviation activities?<br>[5.3.66 to 5.3.73; 5.4.5; 5.5.4; 5.5.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-2 | Are the safety performance indicators relevant to the organization's safety policy as well as management's high-level safety objectives/goals?<br>[5.3.66 to 5.3.73; 5.4.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-3 | Do the safety performance indicators include alert/target settings to define unacceptable performance regions and planned improvement goals?<br>[5.3.66 to 5.3.73; 5.4.5; 5.5.4; 5.5.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-4 | Is the setting of alert levels or out-of-control criteria based on objective safety metrics principles?<br>[5.3.66 to 5.3.73; 5.4.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-5 | Do the safety performance indicators include quantitative monitoring of high-consequence safety outcomes (e.g. accident and serious incident rates) as well as lower-consequence events (e.g. rate of non-compliance, deviations)?<br>[5.3.66 to 5.3.73; 5.4.5; 5.5.4; 5.5.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-6 | Are safety performance indicators and their associated performance settings developed in consultation with, and subject to, the civil aviation authority's agreement?<br>[5.3.66 to 5.3.73; 5.4.5.2; 5.5.4; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-7 | Is there a procedure for corrective or follow-up action to be taken when targets are not achieved and alert levels are exceeded/ breached?<br>[5.4.5; Appendix 6, Table 5-A6-5 b)] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.1-8 | Are the safety performance indicators periodically reviewed?<br>[5.4.5; Appendix 6] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 3.2 — The management of change** | | | |
| 3.2-1 | Is there a procedure for review of relevant existing aviation safety-related facilities and equipment (including HIRM records) whenever there are pertinent changes to those facilities or equipment?<br>[5.3.74 to 5.3.77; 5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |

| *No.* | *Aspect to be analyzed or question to be answered* | *Answer* | *Status of implementation* |
|---|---|---|---|
| 3.2-2 | 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?<br>[5.3.74 to 5.3.77; 5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.2-3 | Is there a procedure for review of new aviation safety-related operations and processes for hazards/risks before they are commissioned?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.2-4 | Is there a procedure for review of relevant existing facilities, equipment, operations or processes (including HIRM records) whenever there are pertinent changes external to the organization such as regulatory/industry standards, best practices or technology?<br>[5.5.4] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 3.3 — Continuous improvement of the SMS** | | | |
| 3.3-1 | Is there a procedure for periodic internal audit/assessment of the SMS?<br>[5.3.78 to 5.3.82; 5.5.4; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.3-2 | Is there a current internal SMS audit/assessment plan?<br>[5.3.78 to 5.3.82; 5.5.4; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.3-3 | Does the SMS audit plan include the sampling of completed/existing safety risk assessments?<br>[5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.3-4 | Does the SMS audit plan include the sampling of safety performance indicators for data currency and their target/alert settings performance?<br>[5.4.5; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.3-5 | Does the SMS audit plan cover the SMS interface with subcontractors or customers where applicable?<br>[5.4.1; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 3.3-6 | Is there a process for SMS audit/assessment reports to be submitted or highlighted for the accountable manager's attention where appropriate.<br>[5.3.80; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |

| No. | Aspect to be analyzed or question to be answered | Answer | Status of implementation |
|---|---|---|---|
| **Component 4 — SAFETY PROMOTION** | | | |
| **Element 4.1 — Training and education** | | | |
| 4.1-1 | Is there a programme to provide SMS training/familiarization to personnel involved in the implementation or operation of the SMS?<br>[5.3.86 to 5.3.91; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 4.1-2 | Has the accountable executive undergone appropriate SMS familiarization, briefing or training?<br>[5.3.86 to 5.3.91; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 4.1-3 | Are personnel involved in conducting risk mitigation provided with appropriate risk management training or familiarization?<br>[5.3.86 to 5.3.91; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 4.1-4 | Is there evidence of organization-wide SMS education or awareness efforts?<br>[5.3.86 to 5.3.91; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| **Element 4.2 — Safety communication** | | | |
| 4.2-1 | Does [Organization] participate in sharing safety information with relevant external industry product and service providers or organizations, including the relevant aviation regulatory organizations?<br>[5.3.92; 5.3.93; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 4.2-2 | Is there evidence of a safety (SMS) publication, circular or channel for communicating safety (SMS) matters to employees?<br>[5.3.92; 5.3.93; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |
| 4.2-3 | Are [Organization] SMS manual and related guidance material accessible or disseminated to all relevant personnel?<br>[5.3.92; 5.3.93; 5.5.5] | ☐ Yes<br>☐ No<br>☐ Partial | |

## 3. DETAILED SMS GAP ANALYSIS AND IMPLEMENTATION TASKS (TABLE A7-2)

The initial gap analysis checklist in Table A7-1 should then be followed up by using the detailed SMS gap analysis and implementation task identification plan in Table A7-2. Once completed, Table A7-2 will provide follow-up analysis on details of the gaps and help translate these into actual required tasks and subtasks in the specific context of the organization's processes and procedures. Each task will then accordingly be assigned to appropriate individuals or groups for action. It is important that correlation of individual element/task development with their descriptive placeholders in the SMS document be provided for in Table A7-2 in order to trigger progressive updating of the draft SMS document as each element is implemented or enhanced. (Initial element write-ups in SMS documents tend to be anticipatory rather than declaratory.)

## 4. ACTIONS/TASKS IMPLEMENTATION SCHEDULE (TABLE A7-3)

Table A7-3 will show the milestones (start-end dates) scheduled for each task/action. For a phased implementation approach, these tasks/actions will need to be sorted according to the phase allocation of their related elements. Refer to Section 5.5 Chapter 5, Doc 9859 3rd edition for the phased prioritization of SMS elements as appropriate. Table A7-3 can be a separate consolidation of all outstanding actions/tasks or, if preferred, be a continuation of Table A7-2 in the form of a spreadsheet. Where it is anticipated that the actual number of tasks/actions and their milestones are sufficiently voluminous and complex so as to require utilizing a project management software to manage them, this may be done by using software such as MS project/Gantt chart as appropriate. Table A7-4 is an illustration of a Gantt chart.

**Table A7-2. Example SMS gap analysis and implementation task identification plan**

| *GAQ Ref.* | *Gap analysis question* | *Answer (Yes/No/Partial)* | *Description of gap* | *Action / task required to fill the gap* | *Assigned task group/person* | *SMS document reference* | *Status of action/task (Open/WIP/Closed)* |
|---|---|---|---|---|---|---|---|
| 1.1-1 | Is there a safety policy in place? | Partial | The existing safety policy addresses OSHE only. | a) enhance the existing safety policy to include aviation SMS objectives and policies or develop a separate aviation safety policy;<br><br>b) have the safety policy approved and signed by the accountable executive. | Task Group 1 | Chapter 1, Section 1.3. | Open |
| etc. | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

**Table A7-3. Example SMS implementation schedule**

| *Action/task required to fill the gap* | *SMS document ref.* | *Assigned task group/ person* | *Status of action/ task* | *Schedule/timeline* | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | *1Q 10* | *2Q 10* | *3Q 10* | *4Q 10* | *1Q 11* | *2Q 11* | *3Q 11* | *4Q 11* | *1Q 12* | *2Q 12* | *3Q 12* | *4Q 12* | *etc.* |
| 1.1-1 a) Enhance the existing safety policy to include aviation SMS objectives and policies or develop a separate aviation safety policy. | Chapter 1, Section 1.3. | Task Group 1 | Open | | | | | | | | | | | | | |
| 1.1-1 b) Require the safety policy to be approved and signed by the accountable executive. | | | | | | | | | | | | | | | | |
| etc. | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |

**Table A7-4. Sample SMS implementation schedule (Gantt chart)**