

# APPENDIX xx to Doc 9859 GUIDANCE ON THE DEVELOPMENT OF A STATE'S SAFETY PROGRAMME (SSP) GAP ANALYSIS

#### 1. Background

In accordance with the Standards and Recommended Practices (SARPs) contained in ICAO Annex 6 — Operation of Aircraft, Part I — International Commercial Air Transport — Aeroplanes, and Part III — International Operations — Helicopters, ICAO Annex 11 — Air Traffic Services, and ICAO Annex 14 — Aerodromes, Volume I — Aerodrome Design and Operations, States are responsible for the implementation of a safety programme in order to achieve an acceptable level of safety for the activities performed by the service providers. The State Safety Programme (SSP) is an integrated set of regulations and activities aimed at improving safety.

#### 2. Gap analysis

The implementation of an SSP requires the State conducts an analysis of its safety system to determine which components and elements of an SSP are currently in place and which components and elements must be added or modified to meet the implementation requirements. This analysis is known as gap analyses, and it involves comparing the SSP requirements against the existing resources in the State.

This guidance provides, in checklist format, information to assist in the evaluation of the components and elements that comprise the ICAO SSP framework and to identify the components and elements that will need to be developed. Once the gap analysis is complete and documented, it will form one basis of the SSP implementation plan.

The gap analysis form included in this guide can be used as a template to conduct a gap analysis. Each question is designed for a "yes" or "no" response. A "yes" answer indicates that the State already has component or element of the ICAO SSP framework in question incorporated into its safety system, whether it matches or exceeds the requirement. A "no" answer indicates that a gap exists between the component/element of the ICAO SSP framework and the safety system in the State.

**Note**. – Within the context of this guidance the term "service provider" refers to any organization providing aviation services. The term includes approved training organizations, aircraft operators, maintenance organizations, organizations responsible for type design and/or assembly of aircraft, air traffic services providers and certified aerodrome operators, as applicable.

## 3. ICAO SSP framework

The ICAO SSP framework comprises four components of the framework contains eleven elements, outlined hereunder:

#### 1. State's safety policy and objectives

- 1.1 CAA safety standards
- 1.2 CAA safety responsibilities and accountabilities
- 1.3 Accident and incident investigation
- 1.4 Enforcement policy

## 2. State's safety risk management

- 2.1 Safety requirements for service providers SMS
- 2.2 Approval of service provider's acceptable levels of safety

#### 3. State's safety assurance

- 3.1 Safety oversight
- 3.2 Safety data collection, analysis and exchange
- 3.3 Safety data driven targeting of oversight on areas of greater concern or need

#### 4. State's safety promotion

- 4.1 Internal training, communication and dissemination of safety information
- 4.2 External training, communication and dissemination of safety information



# State's safety programme (SSP) gap analysis

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
Component	N° 1 – STATE'S SAFETY POLICIES AND	OBJECTIVES	
Element 1.1	- Civil Aviation Authority (CAA) safety st	andards	
	Has the State have promulgated a national legislative framework and specific regulations to allow oversight of the management of safety in the State?	□ Yes □ No	
	Does the State participate in specific activities related to the management of safety in the State?	□ Yes □ No	
	Has the State established requirements, responsibilities and accountabilities regarding the management of safety in the State by the civil aviation authority?	□ Yes □ No	
	Are safety standards are periodically reviewed to ensure they remain relevant and appropriate to the State?	□ Yes □ No	
	Are safety standards periodically reviewed within the CAA to ensure that they are up-to-date with respect to international standards?	□ Yes □ No	
	Is the SSP with its defined components and elements established, maintained and adhered to?	□ Yes □ No	
	Is the SSP appropriate to the scope and complexity of the aviation operations in the State?	□ Yes □ No	
	Has the State established a safety policy?	□ Yes □ No	
	Is the State's safety policy approved by the CAA accountable manager or higher authority within the State?	□ Yes □ No	
	Is the State's safety policy promoted by the CAA accountable manager?	□ Yes □ No	
	Is the State's safety policy reviewed periodically?	□ Yes □ No	

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
	Is the State's safety policy communicated with visible endorsement to all employees in the CAA with the intent that they are made aware of their individual safety responsibilities?	□ Yes □ No	
	Has the CAA developed documentation that describes the SSP, including the interrelationship between its components and elements?	□ Yes □ No	
	Does the CAA have a records system that ensures the generation and retention of all records necessary to document and support the SSP activities?	□ Yes □ No	
	Does the records system provide the control processes necessary to ensure appropriate identification, legibility, storage, protection, archiving, retrieval, retention time, and disposition of records?	□ Yes □ No	
Element 1.2	- CAA safety responsibilities and accour	ntabilities	
	Does the State have identified and defined the CAA's requirements, responsibilities and accountabilities regarding the establishment and maintenance of the SSP?	□ Yes □ No	
	Do the requirements include directives and activities to plan, organize, develop, control and continuously improve the SSP in a manner that meets the State's safety needs?	□ Yes □ No	
	Do the requirements include a clear statement about the provision of the necessary human and financial resources for the implementation and maintenance of the SSP?	□ Yes □ No	
	Has the CAA identified and appointed as accountable manager a qualified person having direct responsibility for the SSP implementation, operation and supervision?	□ Yes □ No	

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
	Is the accountable manager responsibility for ensuring that the State's safety programme is performing to requirements in all areas of the CAA explicitly addressed?	□ Yes □ No	
	Does the accountable manager have control of the financial and human resources required for the proper execution of the SSP?	□ Yes □ No	
	Does the person overseeing operation and supervision of the State's safety programme fulfil the required job functions and responsibilities?	□ Yes □ No	
	Are CAA personnel safety responsibilities and accountabilities, at all levels, regarding the SSP well defined and documented?	□ Yes □ No	
	Do all CAA personnel understand their authorities, responsibilities and accountabilities in regards of the SSP and all safety management processes, decisions and actions?	□ Yes □ No	
Element 1.3	<ul> <li>Accident and incident investigation</li> </ul>		
	Has the State established an independent accident and incident investigation process, the sole objective which is to support the management of safety in the State and not the apportioning of blame on liability?	□ Yes □ No	
Element 1.4 – Enforcement policy			
	Has the State promulgated an enforcement policy that allows service providers to deal with, and resolve safety deviations and minor violations internally, within the context of the service provider safety management system (SMS), to the satisfaction of the authority?	□ Yes □ No	

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
	Does the enforcement policy include provisions for the CAA to deal with events involving gross negligence and wilful deviations through established enforcement procedures?	□ Yes □ No	
Component	N° 2 – STATE'S SAFETY RISK MANAGEN	MENT	
Element 2.1	- Safety requirements for service provide	ers SMS	
	Has the CAA established the regulatory controls and developed associated guidance material governing how service providers will identify operational hazards and manage safety risks?	□ Yes □ No	
	Do these controls include operating regulations and implementation policies for SMS service providers?	□ Yes □ No	
	Are the operating regulations periodically reviewed to ensure they remain relevant and appropriate to the service providers?	□ Yes □ No	
	Is there a structured process within the CAA to assess how the service providers will manage the risks associated with identified hazards, expressed in terms of probability and severity of occurrence?	□ Yes □ No	
	Has the CAA established criteria for evaluating risk?	□ Yes □ No	
	Has the CAA established criteria and/or guidelines to define risk tolerability?		
	Has the CAA risk management strategies, including corrective/ preventive action plans, to address recurrence of documented occurrences and deficiencies?	□ Yes □ No	
	Have the CAA formal processes for evaluating the effectiveness of the corrective/ preventive measures that have been developed?	□ Yes □ No	
	Has the CAA formally documented risk management strategies for corrective/ preventive actions, including timelines?	□ Yes □ No	

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
	Is there a policy in place that ensures effective safety reporting of safety deficiencies, hazards or occurrences including the conditions under which protection from disciplinary and /or administrative action applies?	□ Yes □ No	
Element 2.2	- Approval of service providers acceptable	ole levels of s	afety
	Does the CAA have individually agreed on, and approved, acceptable levels of safety with service providers?	□ Yes □ No	
	Are the agreed acceptable levels of safety commensurate to the complexity of individual service provider's specific operational contexts?	□ Yes □ No	
	Do agreed acceptable levels of safety consider individual service provider's resources to address safety risks?	□ Yes □ No	
	Are agreed acceptable levels of safety expressed by multiple safety indicators and safety targets, as opposed to a single one, as well as by safety requirements?	□ Yes □ No	
	Are agreed acceptable levels of safety periodically reviewed to ensure they remain relevant and appropriate to the service providers?	□ Yes □ No	
Component	N° 3 – STATE'S SAFETY ASSURANCE		
Element 3.1	- Safety oversight		
	Has the CAA established mechanisms to ensure that the identification of operational hazards and the management of safety risks by service providers follow established regulatory controls? (e.g., requirements, specific operating regulations and implementation policies)	□ Yes □ No	
	Do established mechanisms include inspections, audits and surveys to ensure that regulatory safety risk controls are appropriately integrated into the SMS service providers?	□ Yes □ No	

ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation	
	Do established mechanisms ensure that regulatory safety risk controls are practised as designed?	□ Yes □ No		
	Do established mechanisms ensure that regulatory safety risk controls have the intended effect on safety risks?	□ Yes □ No		
	Are regular and periodic reviews conducted regarding the CAA's safety performance?	□ Yes □ No		
	Do reviews consider changes that could affect the State's safety programme, recommendations for improvement and sharing of best practices across the CAA?	□ Yes □ No		
	Is there a process to evaluate the effectiveness of changes related to the SSP?	□ Yes □ No		
	Is there a formal process within the CAA to develop and maintain a set of performance parameters to measure the effectiveness of the SSP?	□ Yes □ No		
Element 3.2	- Safety data collection, analysis and exc	change		
	Has the CAA established mechanisms to ensure the capture and storage of data on operational hazards and safety risks at the State's level?	□ Yes □ No		
	Has the CAA had also established mechanisms to develop information from the stored data, and promote the exchange of safety information with service providers and/or other States as appropriate?	□ Yes □ No		
Element 3.3 – Safety data driven targeting of oversight on areas of greater concern or need				
	Has CAA has procedures to prioritize inspections, audits and surveys towards those areas of greater safety concern or need, as identified by the analysis of data on operational hazards and safety risks areas?	□ Yes □ No		

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Component	N° 4 – STATE'S SAFETY PROMOTION		
Element 4.1	- Internal training, communication and d	issemination	of safety information
	Does the CAA provide internal training, awareness, and two-way communication of safety-relevant information within the CAA?	□ Yes □ No	
	Are there communication processes in place within the CAA that permit the safety programme to function effectively?	□ Yes □ No	
	Are communication processes (written, meetings, electronic, etc.) commensurate with the size and scope of the CAA?	□ Yes □ No	
	Is information established and maintained in a suitable medium?	□ Yes □ No	
	Is there a process for the dissemination of safety information throughout the CAA and a means of monitoring the effectiveness of this process?	□ Yes □ No	
Element 4.2	- External training, communication and o	disseminatior	of safety information
	Does the CAA provide external education, awareness of safety risks and two-way communication of safety-relevant information?	□ Yes □ No	
	Does the CAA encourage safety communications and actively manage safety within the State?	□ Yes □ No	
	Are there communication processes in place within the CAA that allow the SSP to be nationally and internationally promoted?	□ Yes □ No	
	Are communication processes (written, meetings, electronic, etc.) commensurate with the size and scope of the CAA?	□ Yes □ No	
	Is information established and maintained in a suitable medium?	□ Yes □ No	



ICAO reference	Aspects to be analyzed or question to be answered	Answer	Status of implementation
	Is there a formal process for the external dissemination of safety information throughout the State, and means of monitoring the effectiveness of this process?	□ Yes □ No	