SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Purpose:

This Gap Analysis Tool will help your organization identify what you already have in place that meets the Part 5 SMS requirement, and the gaps you will need to fill to comply with Part 5.

General Information:

The column labeled **Part 5** contains the Part 5 reference.
The column labeled **Requirements** contain the synopsis of Part 5.

Instructions:

Organization Name: Enter your organization's name.
Date Revised: Enter date of last update.
Location & Reference: Enter the specific location and reference(s) where each requirement of Part 5 is already located, e.g., Safety Policy, Document Name/Number, Manual; and the reference, e.g., Chapter, Section, Paragraph, etc. If a requirement has not been met, <u>leave blank</u> until that requirement is met.

Organization Name:	Date Revised

Part 5	Requirements	Location & Reference
Subpart B	**Safety Policy**	
5.21	**Safety Policy**	
The policy must contain:		
5.21 (a)(1)	Your organization's safety objectives,	
5.21 (a)(2)	A commitment to fulfill your organization's safety objectives;	
5.21 (a)(3)	A clear statement to commit the necessary resources for implementing your safety management system;	
5.21 (a)(4)	A safety reporting policy that defines requirements for your employees to report safety hazards or issues;	
5.21 (a)(5)	A policy that defines unacceptable behavior and conditions for disciplinary action;	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

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5.21 (a)(6)	An emergency response plan that provides for the safe transition from normal to emergency operations in accordance with the requirements of SMSVP Standard 5.27.	
5.21 (a)(7)	A code of ethics that is applicable to all employees, including management personnel and officers, which clarifies that safety is the organization's highest priority.	
Your safety management processes must require that your safety policy be:		
5.21 (b)	Signed by your accountable executive (described in SMSVP Standard 5.25);	
5.21 (c)	Documented and communicated throughout your organization;	
5.21 (d)	Regularly reviewed by your accountable executive to ensure it remains relevant and appropriate to your organization.	
5.23	**Safety Accountability and Authority**	
Safety Accountability must be defined for:		
5.23 (a)(1)	Your accountable executive, as described in SMSVP Standard 5.25.	
5.23 (a)(2)	All members of management in regard to developing, implementing, and maintaining SMS processes within their area of responsibility; and the following, including, but not limited to:	
5.23 (a)(2)(i)	Hazard identification and safety risk assessment.	
5.23 (a)(2)(ii)	Assuring the effectiveness of safety risk controls.	
5.23 (a)(2)(iii)	Promoting safety as required in subpart E of this standard.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
5.23 (a)(2)(iv)	Advising the accountable executive on the performance of the SMS and on any need for improvement.	
5.23 (a)(3)	Employees relative to the certificate holder's safety performance.	
5.23 (b)	Your safety management processes must identify the levels of management with the authority to make decisions regarding safety risk acceptance for the company.	
5.25	**Designation and Responsibilities of Required Safety Management Personnel**	
Required qualities of the Accountable Executive:		
5.25 (a)(1)	Is the final authority over operations authorized to be conducted under your certificate(s);	
5.25 (a)(2)	Controls the financial resources required for the operations to be conducted under your certificate(s);	
5.25 (a)(3)	Controls the human resources required for the operations authorized to be conducted under your certificate(s);	
5.25 (a)(4)	Retains ultimate responsibility for the safety performance of the operations conducted under your certificate(s).	
Duties of the Accountable Executive:		
5.25 (b)(1)	Ensure that your SMS is properly implemented and performing in all areas of the organization;	
5.25 (b)(2)	Develop and sign your safety policy;	
5.25 (b)(3)	Communicate your safety policy throughout the organization;	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

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5.25 (b)(4)	Regularly review your safety policy to ensure it remains relevant and appropriate to your organization; and	
5.25 (b)(5)	Regularly review the safety performance of your organization and direct actions necessary to address substandard safety performance in accordance with SMSVP Standard 5.75	
Duties of Required Management Personnel: 5.25 (c) Accountable executive must designate sufficient management personnel who are responsible for the following on their behalf:		
5.25 (c)(1)	Coordinate implementation, maintenance, and integration of the SMS throughout your organization.	
5.25 (c)(2)	Facilitate hazard identification and safety risk analysis	
5.25 (c)(3)	Monitor the effectiveness of safety risk controls	
5.25 (c)(4)	Ensure safety promotion throughout your organization as required in Subpart E of this Standard.	
5.25 (c)(5)	Regularly report to the accountable executive on the performance of the SMS and on any need for improvement.	
5.27	**Coordination of Emergency Response Planning**	
Emergency Response Planning must include at least:		
5.27 (a)	Delegation of emergency authority throughout your organization;	
5.27 (b)	Assignment of employee responsibilities during an emergency;	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
5.27 (c)	Coordination of the emergency response plan with the emergency response plans of other affected organizations you must interface with during the provision of its services (e.g., airports, contractors, affiliates, etc.).	
Subpart C	**Safety Risk Management**	
5.51	**Applicability**	
The Safety Risk Management process must be conducted whenever any of the following events occur:		
5.51 (a)	Implementation of new systems;	
5.51 (b)	Revision of existing systems;	
5.51 (c)	Development of operational procedures;	
5.51 (d)	Identification of hazards or ineffective risk controls identified through your safety assurance processes contained within the SMSVP Standard, subpart D, Safety Assurance.	
5.53	**System Analysis and Hazard Identification**	
A system must be analyzed considering at least the following:		
5.53 (b)(1)	Function and purpose of the system;	
5.53 (b)(2)	The system's operating environment;	
5.53 (b)(3)	An outline of the system's processes and procedures;	
5.53 (b)(4)	The personnel, equipment, and facilities necessary for operating the system?	
5.53 (b)(5)	The interfaces of the system.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
Hazards must be identified during system analysis if they are present:		
5.53 (c)	Processes to identify hazards within the context of your system analysis must be developed and maintained.	
5.55	**Safety Risk Assessment and Control**	
Determine what risks are associated with identified hazards:		
5.55 (a)	Processes must be developed and maintained to analyze safety risk associated with identified hazards.	
Safety risk assessment must occur:		
5.55 (b)	A process must be defined for conducting risk assessments that allows for the determination of acceptable safety risk.	
Risk control development process is required:		
5.55 (c)	A process to develop and maintain safety risk controls is required.	
5.55 (d)	Before the risk control is implemented an evaluation must be conducted to determine if the risk will be acceptable with the proposed safety risk control applied.	
5.57	Any operating system hazard identified outside of the company's system requires notice be provided to the interfacing person that can, to the best of their knowledge, address the hazard or mitigate the risk.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
Subpart D	**Safety Assurance**	
5.71	**Safety Performance Monitoring and Measurement**	
Data must be acquired to monitor safety performance and at a minimum must include the following data sources:		
5.71 (a)(1)	Monitoring of operational processes;	
5.71 (a)(2)	Monitoring of the operational environment to detect changes;	
5.71 (a)(3)	Auditing of operational processes and systems;	
5.71 (a)(4)	Evaluations of the SMS and operational processes and systems;	
5.71 (a)(5)	Investigations of Incidents and Accidents;	
5.71 (a)(6)	Reports regarding potential non-compliance with regulatory standards or other safety risk controls established through your SRM process;	
5.71 (a)(7)	A confidential employee reporting system in which employees can report hazards, issues, concerns, occurrences, incidents, as well as propose solutions and safety improvements without concern of reprisal for reporting.	
5.71 (a)(8)	Investigations of hazard notifications that have been received from external sources.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

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Acquired data must be analyzed:		
5.71 (b)	Procedures must be developed and maintained to analyze data acquired from your safety assurance monitoring and measurement processes 5.71 (a)(1-8) and other relevant data from your operations, products and services.	
5.73	**Safety Performance Assessment**	
Safety performance must be assessed against your safety objectives that include reviews by your accountable executive to:		
5.73 (a)(1)	Ensure compliance with your established safety risk controls;	
5.73 (a)(2)	Evaluate the performance of your safety management system;	
5.73 (a)(3)	Evaluate the effectiveness of your safety risk controls established under your SRM 5.55 (c) and identify any ineffective controls;	
5.73 (a)(4)	Identify changes in your operational environment that may introduce new hazards,	
5.73 (a)(5)	Identify new hazards.	
5.73 (b)	If ineffective controls or new hazards are identified under 5.73 (a)(2) through (5) of this section, the safety risk management process described in Subpart C of the SMSVP must be used.	
5.75	**Continuous Improvement**	
Safety performance deficiencies must be corrected:		
5.75	There must be processes to correct safety performance deficiencies identified in the assessments conducted under the requirements of 5.73.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
Subpart E	**Safety Promotion**	
5.91	**Competencies and Training**	
Training must be provided:		
5.91	Each individual identified in 5.23 must be trained to ensure the individuals attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS.	
5.93	**Safety Communication**	
Safety information must be communicated that:		
5.93 (a)	Ensures that employees are aware of the SMS policies, processes and tools that are relevant to their responsibilities in the SMS;	
5.93 (b)	Conveys hazard information relevant to the employee's responsibilities.	
5.93 (c)	Explains why safety actions have been taken; and	
5.93 (d)	Explains why safety procedures are introduced or changed?	
Subpart F	**Documentation and Recordkeeping**	
5.95	**SMS Documentation**	
SMS documentation must be developed and maintained to describe:		
5.95 (a)	Safety Policy.	
5.95 (b)	SMS processes and procedures.	

SMS Implementation GAP Analysis Tool For All Organizations **Except** Sole Individual

Part 5	Requirements	Location & Reference
5.97	**SMS Records**	
SMS has record keeping and retention requirements:		
5.97 (a)	Records of the outputs of safety risk management must be retained for as long as the control remains relevant to the operation.	
5.97 (b)	Records of outputs of the safety assurance processes must be retained such records for a minimum of 5 years.	
5.97 (c)	Records of all required SMS training for each individual must be retained for as long as the individual is employed.	
5.97 (d)	Records of all SMS safety communications required by 5.93 or 5.57 must be retained for a minimum of 24 consecutive calendar months.	