



State Safety Programme for the United Kingdom Overseas Territories of

Anguilla

British Virgin Islands

Montserrat

St Helena

**Issue 7.00
September 2023**

Amendment Record

Issue	Date	Notes
Issue 1.00	17AUG15	Initial version publication, with minor edits from proposed Issue plus 2015 SSP gap analysis update.
Issue 2.00	25AUG16	Complete review and 2016 update SSP gap analysis.
Issue 3.00	01OCT17	Complete review, appendix E added and 2017 update SSP gap analysis.
Issue 4.00	15AUG18	Complete review and 2018 update SSP gap analysis
Issue 5.00	28FEB20	Complete review and 2019 update SSP gap analysis (with additional questions)
Issue 6.00	24APR22	Complete review and 2022 update SSP gap analysis
Issue 7.00	26SEP23	Complete review and 2023 update SSP gap analysis

Foreword

Annex 19 to the Chicago Convention (second edition applicable 7th November 2019) sets the standards for a State Safety Programme (SSP), placing the responsibility on all contracting States to implement such a programme. For the purposes of the Convention, the Overseas Territories (OTs) are an integral part of the United Kingdom (UK). The UK has established legislation for civil aviation in the OTs.

Within the UK OTs the Governor is the appointed representative of the UK and has specific responsibilities for fulfilling the obligations of the UK as defined in the Convention on International Civil Aviation. In this regard, the Air Navigation (Overseas Territory) Order 2013 has been made which sets out the provisions to enable the UK to comply with the Convention on International Civil Aviation (the Convention) and in particular the Annexes to that Convention in the OTs.

The Governor discharges their responsibilities either through the Director of Civil Aviation (DCA) or another person (usually Air Safety Support International (ASSI)) designated for implementation of all Annexes with the exception of Annex 9 – *Facilitation* - and Annex 13 – *Aircraft Accident and Incident Investigation*. Where designated by the Governor ASSI aims to improve the effectiveness of regulatory and oversight programmes to support compliance with the requirements of Annex 19.

The nature of the civil aviation across the UK OTs varies in the type and scale of operations. Due to the geographical spread of the OTs, there are many regional influences and relationships that differ from the UK and Europe. Notably the UK OTs have never been part of the European Union, and most do not adopt European Aviation Safety Agency (EASA) regulations. Therefore, although the UK OTs form part of the overall UK SSP, it is more practicable and appropriate for the designated aviation regulator of each Territory to devise an SSP to address the specific safety needs of their civil aviation industry.

This document describes the State¹ Safety Programme for Anguilla, British Virgin Islands, Montserrat and St Helena for the implementation of Annex 19 SARPs within the UK's State Safety Programme.

ASSI's focus is on evolving and building SSPs for the OTs which properly reflect Annex 19. I would welcome any comments on this document to be sent for my attention at enquiries@airsafety.aero.



Maria Boyle
CEO
Air Safety Support International

¹ Overseas Territories of the UK are not ICAO Contracting States in their own right. The use of the term "State" in this document reflects that ASSI is exercising State functions on behalf of the United Kingdom.

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Overview

- 0.1 ICAO describes a State Safety Programme (SSP) as “*an integrated set of regulations and activities aimed at improving safety*”. The SSP exists to ensure the State achieves an Acceptable Level of Safety Performance (ALoSP). The ALoSP and the means by which it is expressed remains at the discretion of the State. The UK’s ALoSP is stated as, “**no accidents involving commercial air transport that result in serious injuries or fatalities. No serious injuries or fatalities to third parties as a result of aviation activities.**” ASSI seeks to create complementary measures to achieve the UK ALoSP commensurate to the UK OTs’ operations. The concept of establishing an ALoSP attempts to complement the traditional regulatory compliance approach to safety management with a performance-based approach.
- 0.2 The requirement for an SSP recognises that States as well as service providers have safety responsibilities and provides a framework within which service providers are required to establish safety management systems (SMS). ICAO’s Standards and Recommended Practices (SARPs) for an SSP are contained in Annex 19 (second edition, applicable 7th November 2019). The ASSI SSP for Anguilla, British Virgin Islands, Montserrat and St. Helena has been developed using the material within ICAO Document 9859 (Third and Fourth Editions) i.e. the SSP framework and guidance material, including the SSP gap analysis. ASSI holds oversight designations for annexes 6, 8, 10 and 17 in the Falkland Islands. Part of the SSP therefore overlaps to cover these annex areas in the Falkland Islands who have their own complementary SSP. This overlap approach is also reflected in the safety plans.
- 0.3 This document describes the SSP development and construct. Chapter 1 and the early sections of chapter 2 describe the State’s high-level overview along with the underpinning legal structures. The latter sections of chapter 2, chapters 3, 4 and 5 focus more on the aviation regulatory work of ASSI within UK OTs where it holds designations.

Glossary

AAIB	UK DfT Air Accidents Investigation Branch
ALoSP	Acceptable Level of Safety Performance
ANO	UK Air Navigation Order
AN(OT)O	UK Air Navigation (Overseas Territories) Order
AOC	Air Operator Certificate
ASSI	Air Safety Support International Limited
ASSI D	Air Safety Support International Direct Oversight
ATC	Air Traffic Control
ATCO	Air Traffic Control Officer
ATS	Air Traffic Services
CAA	UK Civil Aviation Authority
CD	UK Crown Dependency
CEO	Chief Executive Officer
CHIRP	UK Confidential Human Factors Incident Reporting Programme
CMA	Continuous Monitoring Approach (ICAO USOAP)
CNS	Communications, Navigation, Surveillance
CTR	Controlled Traffic Region (control zone)
DCA	Director of Civil Aviation
DfT	UK Department for Transport
DME	Distance Measuring Equipment
Doc	Document
EASA	European Aviation Safety Agency
ECAC	European Civil Aviation Conference
ECCAIRS	European Coordination Centre for Accident and Incident Reporting System
EI	Effective Implementation (ICAO USOAP)
FAA	Federal Aviation Administration (United States)
FCDO	Foreign, Commonwealth & Development Office
FRMS	Fatigue Risk Management System
GA	General Aviation
GASP	Global Aviation Safety Plan (ICAO)
ICAO	International Civil Aviation Organisation
HF	Human Factors
HM	His Majesty
IA	Implementation Assessment (ICAO PQ)
IATA	International Air Transport Association
IBIS	ICAO Bird Strike Information System
iSTARS	Integrated Safety Trend Analysis Reporting System (ICAO)
liC	Inspector in Charge
IT	Information Technology
MOR	Mandatory Occurrence Report
MoA	Memoranda of Agreement
MoU	Memoranda of Understanding
NASP	National Aviation Safety Plan
PBN	Performance Based Navigation
PoE	Pool of Experts
OLF	Online Framework (ICAO USOAP)
OTs ²	UK Overseas Territories
OTAA	Overseas Territories Aviation Authorities
OTAC	Overseas Territories Aviation Circular
OTAR	Overseas Territories Aviation Requirement
OTSPC	Overseas Territories Safety Performance Council
PQ	Protocol Question (ICAO)

² References to OTs within this document are specifically to only the OTs of Anguilla, Bermuda, British Virgin Islands, Cayman Islands, Falkland Islands, Montserrat, St. Helena and Turks and Caicos Islands.

QMS	Quality Management System
RASP	Regional Aviation Safety Plan (ICAO North American, Central American and Caribbean)
RNP	Required Navigation Performance
RNAV	Area Navigation
SAFA	Safety Assessment of Foreign Aircraft
SAR	Search and Rescue
SARPs	ICAO Standards and Recommended Practices
SMS	Safety Management System
SoS	Secretary of State
SPI	Safety Performance Indicator
SPT	Safety Performance Target
SSP	State's Safety Programme
SSPIA	State Safety Programme Implementation Assessment (ICAO)
TMA	Terminal Manoeuvring Area
UCS	Unit Competence Scheme
UK	United Kingdom
UKBSC	UK Birdstrike Committee
USOAP	ICAO Universal Safety Oversight Audit Programme

Chapter 1 UK OT aviation regulatory system

1.1 Introduction

1.1.1 This chapter sets out the legislative structure which applies to the UK OTs. It should be noted that while Gibraltar is an OT, it is not included in the secondary legislation and therefore does not come under ASSI's remit.

1.2. The UK OTs

1.2.1 When the UK ratified the Convention on International Civil Aviation (signed at Chicago on 7th December 1944), it did so on behalf of the various colonies, protectorates and dependencies that existed at the time. Today, the UK's adherence to the Chicago Convention covers the United Kingdom of Great Britain and Northern Ireland (UK 'Main'), the UK's OTs and the Crown Dependencies (CDs).

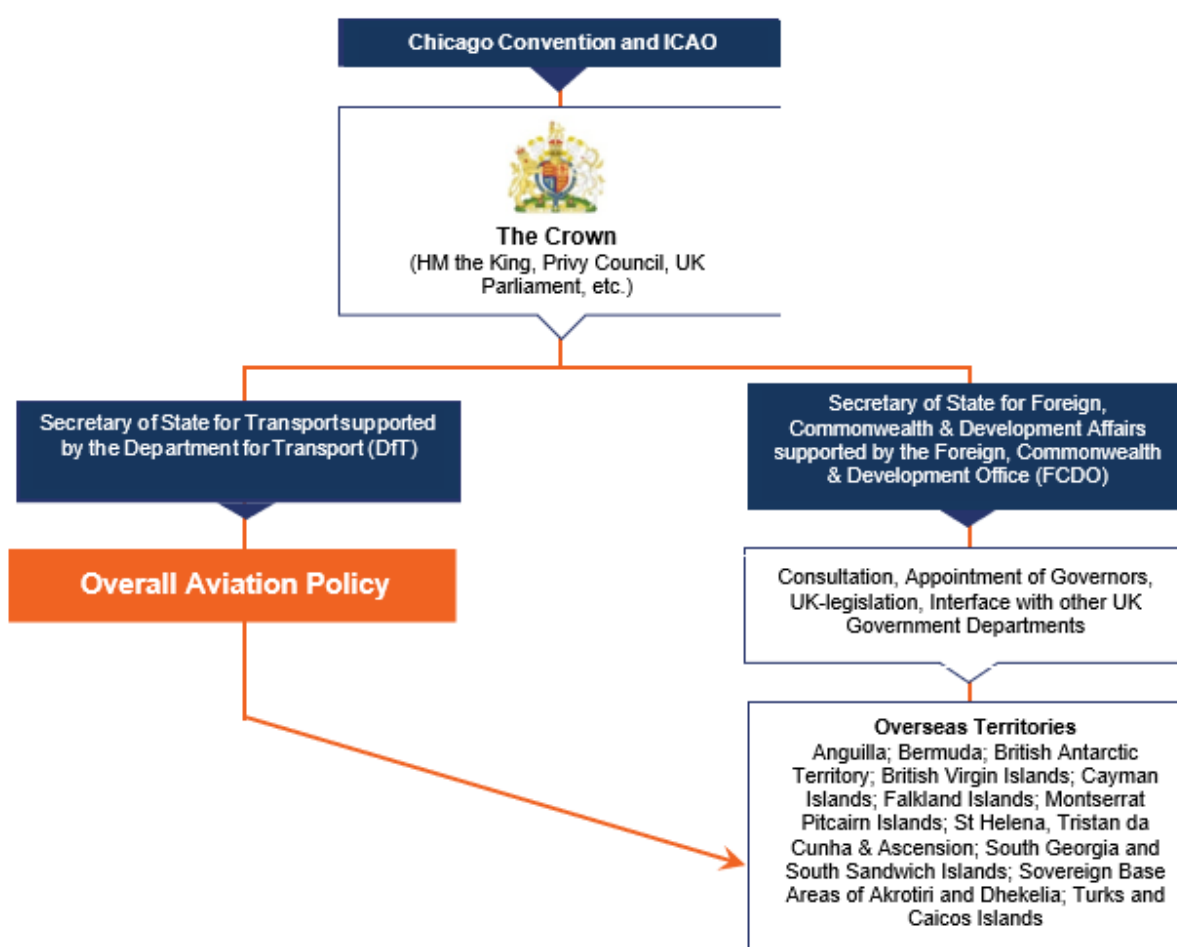


Figure 1- The UK as a contracting State to ICAO (simplified constitutional relationship between ICAO, UK and its OTs, note that not all have aviation activity)

1.2.2 The Privy Council, that meets approximately monthly, consists of all the members of the British Cabinet, former Cabinet ministers, and other distinguished persons appointed by the Sovereign including past and present leaders of the British opposition parties. Its functions include advising His Majesty the King on Orders in Council and granting Royal Charters. The British Cabinet remains formally a committee of the Privy Council.

- 1.2.3 Orders in Council are approved by His Majesty the King at meetings of a small number of Privy Counsellors. Orders in Council establishing legal requirements are Statutory Instruments and are normally subject to UK Parliamentary scrutiny. The Order in Council is an important method of giving force of law to the more significant executive orders. Orders in Council are also used to extend civil aviation legislation to the OTs. The Office of Public Sector Information provides access to legislation of the UK; this is available online (www.legislation.gov.uk).
- 1.2.4 The UK DfT is the primary governmental body responsible for civil aviation in the UK and for upholding the UK's compliance with the Chicago Convention. As such, the DfT establishes overall aviation policy in cooperation with the FCDO for the UK OTs. The UK CAA has no regulatory responsibility for safety oversight of aviation in the UK OTs.
- 1.2.5 There are fourteen UK Overseas Territories, which retain a constitutional link with the UK. All have separate constitutions made by a UK Order in Council. The UK remains responsible, however, for discharging its obligations under the Chicago Convention in respect of civil aviation in the OTs.
- 1.2.6 Parts of the 1949 and 1982 Civil Aviation Acts have been extended to the OTs by Orders in Council. The 1949 Act provides for His Majesty the King to make an Air Navigation Order (ANO) to implement the Annexes to the Chicago Convention and to regulate air navigation generally. The Air Navigation (Overseas Territories) Order (AN(OT)O) gives the Governor of each OT powers and responsibilities in respect of aviation safety oversight. Gibraltar, however, is not included in the OTs to which it applies.
- 1.2.7 The AN(OT)O 2013 requires the Governor to designate the majority of their powers to a person; in practice this is either a local Director of Civil Aviation (DCA) who is either an employee of the OT's Government, or of a Statutory Body, or to Air Safety Support International Limited (ASSI), a company wholly owned by the UK CAA but which reports to the Secretary of State (SoS) for Transport. The Governor is required to consult ASSI before making (or revoking) any such designation. ASSI conducts routine assessment visits to the OT where a person, other than ASSI itself, has been designated by the Governor.
- 1.2.8 In the Civil Aviation Authority (Overseas Territories) Directions 2003, the SoS directed the CAA to establish ASSI as a company to oversee aviation safety regulation in the OTs and to ensure compliance with the requirements of the Convention. The current Directions are the Civil Aviation Authority (Overseas Territories) Directions 2014 (as amended by the Civil Aviation Authority (Overseas Territories) (Variation) Directions 2015), a consolidated copy of which is available on the ASSI website (www.airsafety.aero). These Directions extended ASSI's responsibilities to include aviation security oversight and regulation but exclude Annex 9 from ASSI's responsibilities. ASSI has been charged with developing and maintaining the AN(OT)O and producing Overseas Territories Aviation Requirements (OTARs) to support it.
- 1.2.9 The AN(OT)O also requires the Governor to publish detailed requirements which applicants for certificates and licences will have to meet. Such requirements are primarily the OTARs developed by ASSI in conjunction with the OT DCAs.
- 1.2.10 ASSI is responsible, where appropriate, for providing assistance, training and advice to those in the Territories with responsibility for the regulation of civil aviation.

- 1.2.11 In an OT where there is no local civil aviation regulator, or where the regulator does not have the resources or the expertise to undertake the task itself, ASSI can be designated by the Governor to perform the civil aviation regulatory tasks. ASSI therefore performs the role of policymaker, advisor/ mentor, and assessor of the efficacy of regulatory oversight where it is not the designated regulator and, depending on the situation in the Territory, performs the role of regulator.



Picture 1 - Terrence B Lettsome International Airport British Virgin Islands

Chapter 2 UK OT safety policy and objectives

State safety legislative framework

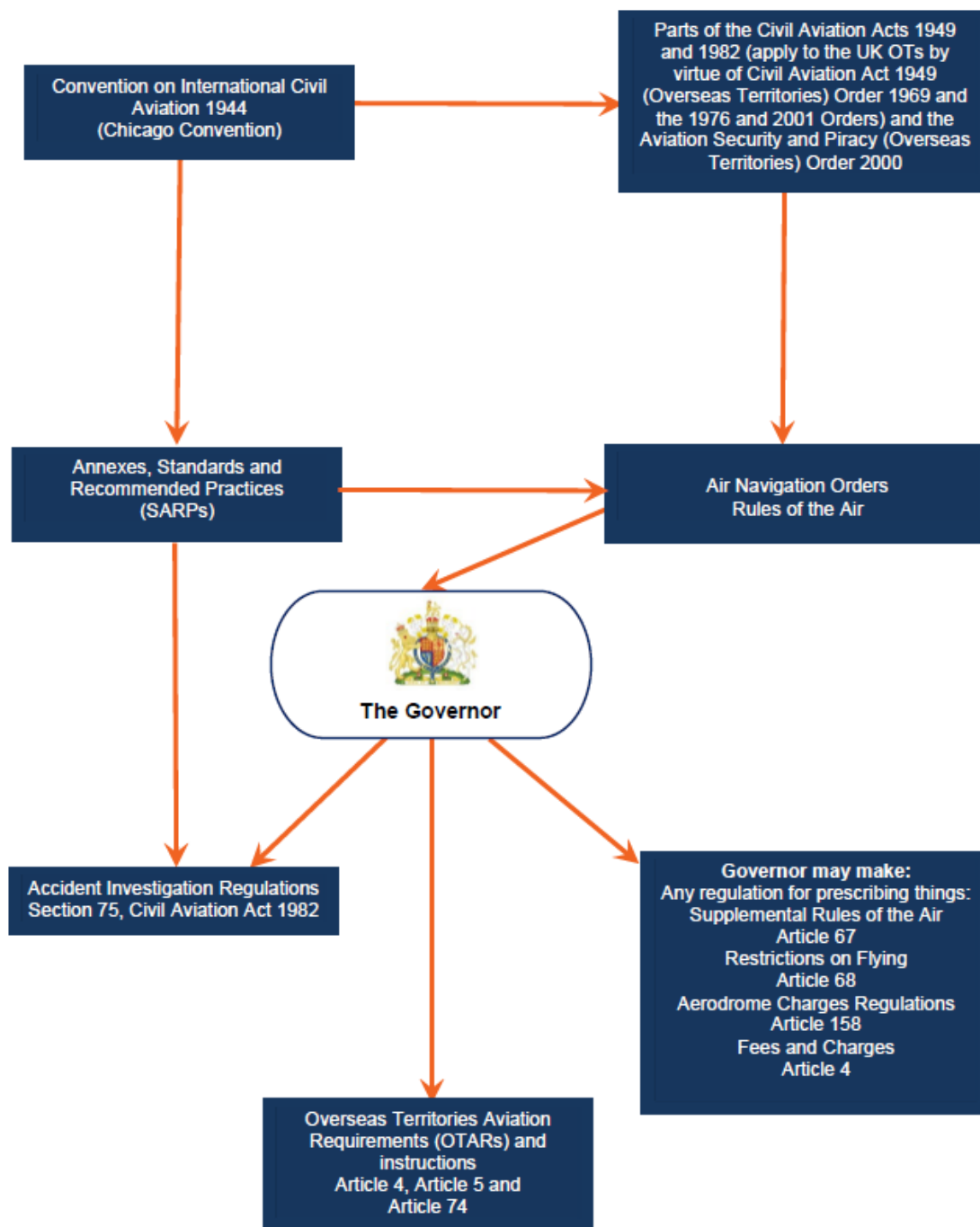


Figure 2 - UK Overseas Territories regulatory framework, note article refers to the provisions of the AN(OT)O 2013.

2.1 Primary legislation - Civil Aviation Act 1949 (Overseas Territories) Order 1969

- 2.1.1 The Civil Aviation Act 1949, as extended to the OTs by the Civil Aviation Act 1949 (Overseas Territories) Order 1969 is the primary legislation that provides the authority to apply the provisions of the Convention and annexes by Order in Council and implement other statutory instruments in the area of civil aviation in the OTs.

2.1.2 This Act has been supplemented by the extension of certain sections of the Civil Aviation Act 1982 to the OTs:

- By the extension of sections 61, 75 and 76(4) of the Civil Aviation Act 1982 to the Overseas Territories (by the Civil Aviation Act 1982 (Overseas Territories) Order 2001 and No.2 Order 2001).
- Section 61 increased the penalties for breach of an AN(OT)O.
- Section 75 enables the Governors to make air accident and investigation regulations.
- Section 76(4) amends section 40(2) of the 1949 Civil Aviation Act, so that where an aircraft is chartered or demised for more than 14 days, the lessee rather than the owner (lessor) is liable for any damage or injury caused to any property or person on the ground by the chartered or demised aircraft.

2.1.3 Certain parts of the Aviation Security Act 1982 (Parts 1 (offences against the security of aircraft etcetera) and 2 (protection of aircraft, aerodromes and air navigation installations against acts of violence)) and Schedule 1 of the Act (provisions relating to compensation), along with sections 1 and 50 of the Aviation and Maritime Security Act 1990 (endangering safety at aerodromes and offences by bodies corporate), were extended to the OTs by the Aviation Security and Piracy (Overseas Territories) Order 2000.

2.1.4 Part 2, section 8 of the Civil Aviation Act 1949 (Overseas Territories) Order 1969, as amended by the Civil Aviation Act 1982 (Overseas Territories) Order 2001, makes provision for the creation and maintenance of the Air Navigation (Overseas Territories) Order to implement the Annexes of the Chicago Convention. Certain provisions of the 1982 Civil Aviation Act have also been extended to the OTs (see below).

2.2 **Subsidiary legislation – Air Navigation (Overseas Territories) Order 2013**

2.2.1 The AN(OT)O is secondary (i.e. subordinate) legislation to provide a sound legal framework for enabling the adoption of the Overseas Territories Aviation Requirements (OTARs) as a common cohesive package of requirements. The AN(OT)O enables, or gives power to, the requirements contained in the OTARs. It does not apply to Gibraltar.

2.2.2 The latest revision updates the AN(OT)O to form a coherent unit with the OTARs - the OTARs being the principal regulatory instruments and the AN(OT)O providing mainly the necessary legal basis. The AN(OT)O 2013, became effective in January 2014 and reflects changes required as a result of the safety oversight audit carried out by ICAO in 2009. Five amendments have been made to date to the AN(OT)O 2013 – see the 2014(2), 2015 and 2021(2) amendment Orders.

2.2.3 The AN(OT)O gives the Governors a wide variety of discretionary powers which are exercised by the designated regulator to grant certificates, licences and approvals. An individual or organisation affected by certain decisions made by the regulator on behalf of a Governor is entitled to seek a review by the Governor of such decision in accordance with Article 13 of the AN(OT)O.

2.3 **Operating regulation/ requirements – Overseas Territories Aviation Requirements (OTARs)**

2.3.1 The OTARs comprise a package of requirements that forms a means of compliance with the ICAO SARPs and that is consistent with the legislation in force.

2.3.2 ASSI is required, under the directions from the Secretary of State, to produce the means of compliance to enable the Governors to be satisfied that applicants for, or holders of, licences, certificates and approvals meet their legal obligations. Governors are required under Article 5 of the AN(OT)O to publish these requirements. The OTARs do not constitute 'regulations' in legal terms. They do, however, conform to the wider ICAO definition of regulations used in ICAO Doc 9734 Safety Oversight Manual in relation to Critical Element 2 and were recognised as such by ICAO during the 2009 USOAP audit of the UK.

2.3.3 The OTARs set out, for the benefit of those regulated:

- the requirements for obtaining and holding a licence, certificate, authority or approval;
- the way in which the rights and privileges of licences, certificates, authorities or approvals should be exercised;
- the way obligations which come with the privileges are to be discharged; and
- general instructions regarding the operation and equipment of aircraft.

2.4 Industry guidance material – Overseas Territories Aviation Circulars (OTACs)

2.4.1 There is also a need to promulgate additional information which is not appropriate for inclusion in the OTARs themselves. Such information and guidance can be found in Overseas Territories Aviation Circulars (OTACs).

2.4.2 These include the following information:

- practical, detailed guidance on meeting the requirements;
- information of a temporary nature;
- administrative material;
- information published in advance of a formal amendment to OTARs;
- the means of ensuring that aspects of the State civil aviation system comply with ICAO SARPs where this is a state responsibility, e.g. SAR.



Picture 2 – St. Helena airport terminal building and ATC tower.

2.5 UK OT civil aviation framework and accountabilities

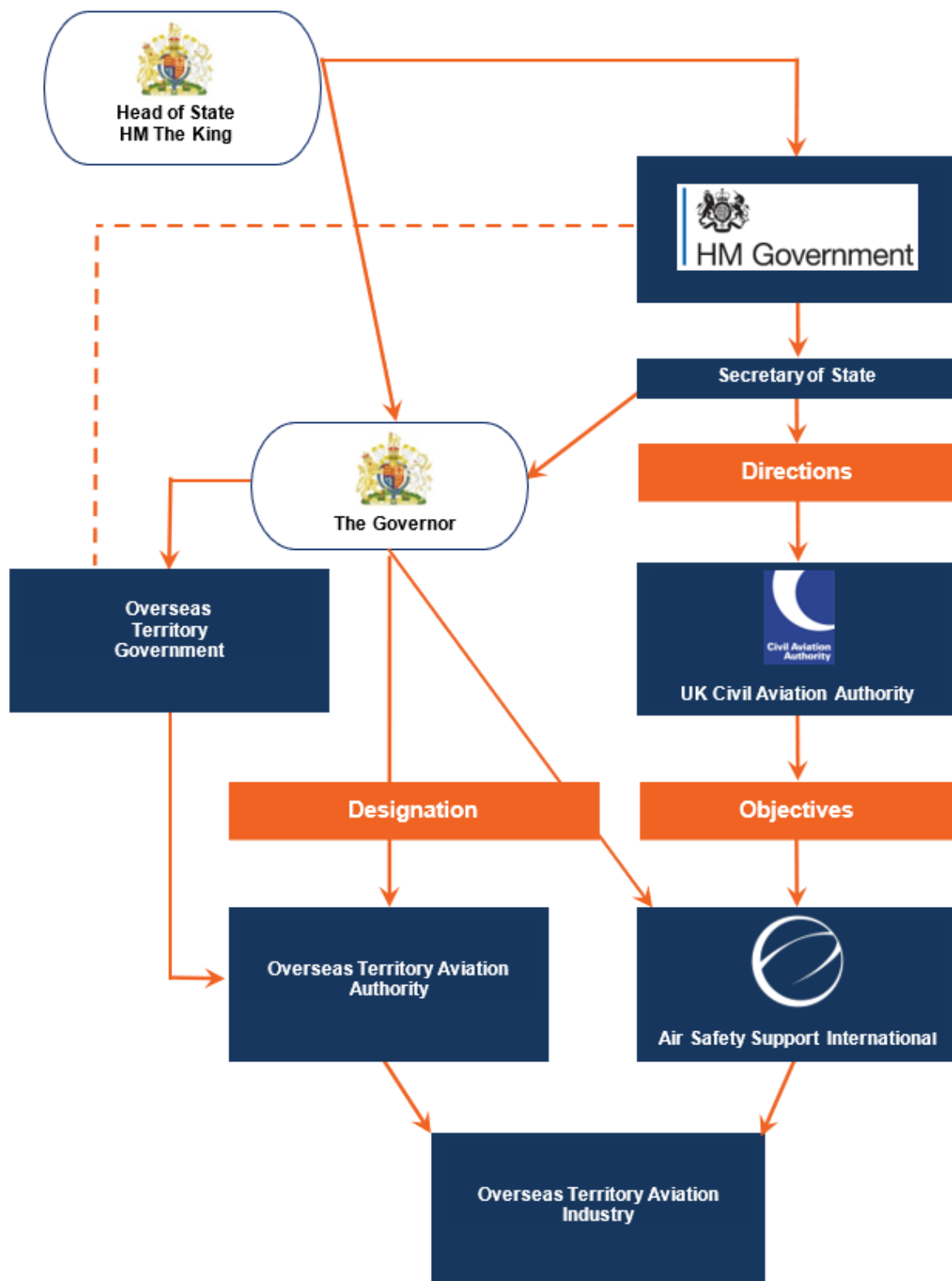


Figure 3 - UK Overseas Territories flow of authority.

The UK Department for Transport responsibilities

- 2.5.1 The Department for Transport (DfT) is responsible for setting overall policy for the standards of safety and security in transport in the UK, including civil aviation. It is the ultimate authority responsible for the coordination of ICAO-related matters. It is also responsible for the management of international affairs in the civil aviation context, which are reserved to the UK under the OTs' Constitutions. The Secretary of State has issued Directions for the UK CAA to establish ASSI and which set out ASSI's responsibilities. The Secretary of State's Directions require the UK CAA to set objectives for ASSI which the Secretary of State approves.

The UK OTs' Governors' responsibilities

- 2.5.2 The Governor is His Majesty the King's representative and acts on behalf of the UK Government in relation to the general governance of a Territory, within the scope of the respective Constitution, and in relation to those international affairs which are reserved to the UK under the Constitution. Governors are accountable to the Foreign, Commonwealth and Development Office (FCDO).
- 2.5.3 As His Majesty the King's representative, the Governor is responsible for ensuring the adequacy of the civil aviation safety regulation within a UK OT. Within each OT the Governor appoints a Regulator to carry out most of the Governor's functions under the AN(OT)O.

The UK Civil Aviation Authority responsibilities

- 2.5.4 The UK CAA appoints the Board of ASSI, a wholly owned company of the UK CAA, along with enacting the Directions to establish ASSI and setting objectives for ASSI subject to the Secretary of State's approval. The UK CAA is also required to audit annually the activities of ASSI. The UK CAA does not have any responsibility for aviation regulatory oversight of the UK OTs.

Air Safety Support International responsibilities

- 2.5.5 ASSI is responsible for the drafting of the AN(OT)O, OTARs and OTACs in order to implement the ICAO SARPs. ASSI is also responsible for undertaking regular assessments of OT Aviation Authorities on the standards of civil aviation safety regulation and the adequacy of the resources employed, to advise to the Secretary of State and the Governor on whether the Territory is complying with the UK's obligations under the Chicago Convention and on whether any remedial measures may be necessary. These include advice and recommendations to the Governor on the designation of a regulator in the Territory.
- 2.5.6 ASSI is the designated regulator responsible for Annex 17 (Security) within all the UK OTs. ASSI is fully designated for all functions under the AN(OT)O (other than those reserved to the Governor³) in Anguilla, British Virgin Islands, Montserrat and St Helena. ASSI is designated for certain functions in the Falkland Islands.

2.6 Framework/ regulations review

- 2.6.1 Regulations are regularly reviewed by ASSI and tracked on an electronic management system. In addition to periodic review a review may be triggered through:
- monitoring of ICAO State Letters

³ These are specifically publishing of requirements, hearing of appeals and issuing of supplementary rules.

- safety issue feedback from the OTAA's via the Overseas Territories Safety Performance Council (OTSPC)
- DCA feedback
- ASSI/ OTAA Inspector seminars/ webinars
- ASSI/ OTAA training events
- direct feedback from ASSI/ OTAA staff
- direct feedback from service providers
- UK legislation changes that impact the regulations

2.7 State Safety Programme documentation and records

- 2.7.1 This SSP document is subject to regular review. It is based on the now superseded ICAO Document 9859 Safety Management Manual Edition 3 (Appendix 8 to Chapter 4). This external facing document continues to provide useful information, such as, the overview of the SSP, record of progress, references to other SSP documentation and contains SSP documents for promotion purposes (e.g. safety policy, UK State Safety Objectives, enforcement policy and enforcement diagram).
- 2.7.2 Nearly all the SSP implementation plan has been completed. The SSP now moves into a continuous improvement phase and safety plans to achieve the UK aviation safety objectives. Based on the ICAO Global Aviation Safety Plan (GASP), and the ICAO North American, Central American and Caribbean Regional Aviation Safety Plan (RASP) ASSI has produced a National Aviation Safety Plan for the UKOTs who are within this SSP.
- 2.7.3 ASSI's IT management system, SharePoint and website (www.airsafety.aero) facilitate the operation of many SSP functions. For example, risk management, reporting, auditing, document control, meeting minutes, and data analysis. They also contain information and records.

2.8 State Safety responsibilities and accountabilities

State Safety Programme development

- 2.8.1 The OTSPC, which comprises UK OT Directors of Civil Aviation, ASSI and UK OT representatives, conducted an ICAO Document 9859 Safety Management Manual (Third Edition) SSP Gap Analysis in November 2013 (see Appendix C). This gap analysis, for each OTAA, has formed the basis of several UK OT SSP implementation plans. Noting the size and resource of each OTAA, the initial focus of the work was to address the missing elements identified by the gap analysis. As these elements were completed the focus moved from implementation to continuous improvement. A record of each UK OT's current SSP gap analysis progress is held within the ICAO iSTARS system. Current gaps and areas for improvement form part of the organisational sections of the safety plan.

2.9 State Safety Programme responsibilities and resources

- 2.9.1 Although the primary responsibility for the UK SSP rests with the DfT, ASSI where designated by an OT Governor performs the safety-related functions and therefore coordinates the SSP and the associated documentation for those Territories. The CEO of ASSI is accountable for that SSP and the resource allocations to sustain it. The Safety Performance and Risk Manager is responsible for the development and operation of the SSP.

2.10 State Safety Programme coordination committee

- 2.10.1 The ASSI CEO is a member of the UK Aviation Safety Strategy Board; this facilitates coordination with the overall UK State activities. Where applicable, and required, ASSI staff attend UK State level SSP related meetings that affect the UK OTs. The UK DfT and FCDO each have a non-Executive appointee to the ASSI Board of Directors.
- 2.10.2 The OTSPC, co-chaired by the ASSI CEO and a UK OT DCA, meets twice a year where it regularly reviews the SSP progress and activities of the UK OTs. The OTSPC's vision *is to improve safety performance in the OTs and set the benchmark for others*.
- 2.10.3 ASSI liaises with UK OT Governors and UK OTs governments and agencies where required to progress SSP implementation and activities. ASSI is looking to improve and strengthen these to further support the SSP in the future.
- 2.10.4 Within ASSI the monthly Safety Action Group Meeting reviews ASSI's operation and any SSP activity for UK OTs where it is designated. Supporting this, a weekly Assurance Meeting reviews oversight, occurrence reports and information on aviation activities.

2.11 State Safety Policy

- 2.11.1 The ASSI Safety Policy is regularly reviewed. It is available via the ASSI website and is contained in Appendix A.

2.12 State acceptable level of safety

- 2.12.1 The UK's acceptable level of safety is **“no accidents involving commercial air transport that result in serious injuries or fatalities. No serious injuries or fatalities to third parties as a result of aviation activities.”**
- 2.12.2 To support this acceptable level of safety, ASSI reviewed 2017/ 2018 data including occurrence reports and regulatory findings to create an initial set of safety performance indicators (SPIs). These were based on the ICAO Document 9859 structure creating both high level outcome and process orientated SPIs. These relate to operational risks, State functions, State activities, compliance oversight processes and SMS implementation. These have been superseded in 2021 with the creation of the NASP that incorporated some of them going forward.
- 2.12.3 The previous indicator's data for 2018, 2019 and 2020 shows mixed results. Therefore, work continues in these areas within the NASP. Two major factors that cannot be ignored that have impacted on the results are the two hurricanes in September 2017 and Covid-19.
- 2.12.4 The previous SPI areas that will continue in the NASP reflect workstreams such as wildlife hazard management, runway safety (excursion and incursion), QMS and SMS implementation. In a number of cases specific targets are not set, the target is to either maintain, reduce, increase or complete. Using both the [ICAO Global Aviation Safety Plan 2020](#) and the [North American, Central American and Caribbean Regional Aviation Safety Plan](#) ASSI has produced a safety plan to ensure the UK's acceptable level of safety.

2.13 State Safety Programme improvement/ review

- 2.13.1 The OTSPC regularly reviews, amongst other related items, the 2013 SSP gap analysis to monitor progress of each OTAA's SSP implementation.

- 2.13.2 SSP implementation and improvement are continuously reviewed as part of the ASSI business planning and risk process. Annex 19 work features in our strategic objectives and the business objectives are set to progress these. Completion of the ICAO protocol questions also provide opportunities for regular assessment and improvement.
- 2.13.3 ASSI whilst updating the ICAO Universal Safety Oversight Audit Programme (USOAP) continuous monitoring approach (CMA) online framework (OLF) provides regular review of the SSP. Furthermore, ICAO SSP implementation assessment (IA) protocol questions (PQs) provide an additional review that commenced in 2021. These identify gaps and areas for improvement.
- 2.13.4 In November 2022 ASSI observed the ICAO State Safety Programme Implementation Assessment of the UK CAA. This provided an opportunity to learn lessons and further review the SSP development. Overall, this affirmed the path taken to date with some points for further improvements.
- 2.13.5 To deliver an SSP over the last few years ASSI has made advancements in the following:
- Business planning and business risk processes
 - Safety risk process development
 - Assurance and safety action group meetings
 - Regulatory auditing (remote auditing)
 - Data collection, records and analysis
 - Reporting and enforcement
 - SSP related documentation
 - Training (PBN, Wildlife Hazard Management, AvSec, ATS UCS/ FRMS)
 - Electronic management system
 - Service provider QMS and SMS
- 2.13.6 This work allows ASSI to operate an improved data driven SSP. Many of the SSP building blocks are in place and now ASSI looks to continuously improve on this. The NASP reflects this with goals to improve SMS, provision of safety information to ICAO, improving relationships with aviation stakeholders and improving ASSI's safety risk processes.

2.14 State accident and incident investigation

- 2.14.1 In each OT the Governor has made accident investigation regulations under Section 75 of the Civil Aviation Act 1982, as extended to the OT by an Order in Council, which empowers the Governor to appoint investigators to investigate accidents and serious incidents.
- 2.14.2 Memoranda of Agreement (MoA) or Understandings (MoU) are in place between individual Territories and the UK Air Accidents Investigation Branch (AAIB). In the majority of the OTs the Chief Inspector of the AAIB has been appointed as the Chief Inspector of Air Accidents. The Chief Inspector appoints individual inspectors from within the AAIB for the purposes of undertaking any investigation required under the regulations and in accordance with such regulations.
- 2.14.3 Once the Governor has notified the AAIB of an accident or serious incident, an Inspector in Charge (IiC) will be appointed by the Chief Inspector of the AAIB. The IiC will be a member of the AAIB, irrespective of whether the AAIB attends the scene of the accident or whether the investigation is conducted remotely, from the UK.
- 2.14.4 Each OT nominates a suitably qualified person or organisation who on behalf and under the instruction of the IiC facilitates the securing and preservation of evidence. Kits to perform such tasks have been provided. The AAIB delivers training to the OTs on actions to be taken in the event of an accident or serious incident.

2.15 State Enforcement Policy

- 2.15.1 Following the OTSPC gap analysis it was agreed by the OTAA DCAs and ASSI that a common enforcement policy could be adopted by all OTAAAs. The policy is based on ICAO 9859 Safety Management Manual guidance and the associated process, is regularly reviewed. In 2019 Bermuda withdrew from following this policy having created its own. A copy of the ASSI policy is contained in Appendix B, and the supporting enforcement guide graphic is contained in Appendix E.
- 2.15.2 The enforcement procedure that accompanies the policy recognises that enforcement covers a range of activities from routine everyday oversight to powers that enable the prevention of flight, suspension, variation or revocation of a licence or certificate, and ultimately, prosecution. In line with the AN(OT)O, the procedure provides a right of review. The policy and procedure support a consistent approach to enforcement that considers the performance of the service provider's Safety Management System (SMS), cases of voluntary reporting, and each case's circumstance. It is based on the overall aim of achieving compliance and safe operation.
- 2.15.3 Should a case escalate to prosecution; it is handed over to the local OT criminal prosecution service. A failure to comply with the AN(OT)O and its related regulation may be a criminal offence. Specialist Investigation Officers can be called upon along with legal expertise to advise on such a course of action. It is of note that in any such case it is important to ensure that any safety issue is addressed without waiting for the prosecution to finish, as the prosecution process will not achieve this. Care is taken so not to prejudice any prosecution case, but adequately address the safety issue.

Chapter 3 UK OT safety risk management

3.1 Safety requirements for the service provider's SMS

- 3.1.1 Many of the service providers under ASSI's direct regulatory oversight are not complex operations (see Appendix D). Annex 19 notes that a Safety Management System should be commensurate with the size of the service provider and the complexity of its aviation products or services. Some of the processes within a safety management system, as noted by ICAO 9859 Safety Management Manual, can be integrated into existing systems such as quality management or security management systems that may already be employed by service providers. The approach taken to fully implement SMS was to evolve elements over time, and where possible, integrate these into other established systems thereby achieving efficiencies.
- 3.1.2 Regulatory oversight visits review services providers' systems and processes. Hazard logs, safety meetings and reporting (just culture) are the continued core focus. A general checklist, reviewed in May 2021, accompanies each audit that examines SMS related items. ASSI completed a review of all service provider's SMS Manuals in 2020. During 2020 each service provider was provided with safety performance indicator training. Following this training ASSI agreed with each service provider a set of safety performance indicators.
- 3.1.3 ASSI has developed a standard SMS requirement text based on Annex 19 that is appended to the relevant OTARs as they are reviewed and updated. This text is currently published within the Safety Management Systems OTAC. This text has explicitly listed safety reporting and investigation processes to highlight the important part these play in hazard identification. The following OTARs should require an SMS to be established appropriate to the size and complexity of the operation:
- | | |
|------------|--|
| • OTAR 61 | Pilot Licences and Ratings (Training Organisation) |
| • OTAR 65 | Air Traffic Services Personnel Licensing, Ratings and Training Organisation Approval |
| • OTAR 66 | Aircraft Maintenance Personnel licensing (Training Organisation) |
| • OTAR 119 | Air Operator Certification |
| • OTAR 125 | Complex GA (including Corporate Operations) |
| • OTAR 139 | Certification of Aerodromes |
| • OTAR 145 | Aircraft Maintenance Organisation Approval |
| • OTAR 172 | Air Traffic Service Organisation Approval |

3.2 Agreement of product or service provider's safety performance

- 3.2.1 ASSI continuously evolves its processes to collate and evaluate data to assess the safety performance of service providers. This includes reviews across different aviation disciplines related to each service provider using audit findings, ramp checks, operational data, any enforcement action history and occurrence reports. International and State safety/ incident data is regularly reviewed and shared amongst the ASSI team.
- 3.2.2 Inspectors, Policy Specialists and the Safety Performance and Risk Manager meet to review relevant information on service providers and the UK OT operating environment at both the weekly Assurance team meeting and SAG.
- 3.2.3 ASSI has not at this time, established Acceptable Levels of Safety Performance for service providers, only that the UK's level is met. In 2019 ASSI shared the UK ALoSP and ASSI safety performance indicators to service providers. Following the 2020 SMS manual reviews and SPI training, service provider performance indicators were agreed. The NASP contains revised ASSI performance indicators going forward.

- 3.2.4 Safety performance indicators will initially be monitored to ascertain the base levels. Based on these indicators, targets will then be to either complete, maintain, increase or decrease these.
- 3.3 **Periodic assessment of the product or service provider's SMS**
- 3.3.1 In 2014, the ASSI Safety Development Manager conducted a SMS, QMS and Human Factors (HF) review of ASSI's direct oversight service providers. This provided a baseline to assess SSP and SMS implementation progress. As part of a previous SMS OTAC revision in 2016 an associated SMS checklist was developed to assess Service Providers setting up an SMS for certification and those requiring a periodic review. This checklist has been used to evaluate Service Provider's SMS function and new Service Provider applications, the checklist being split between 'prior to certification' and 'post certification' functional elements.
- 3.3.2 Most Service Providers have completed a full SMS assessment. A complete SMS manual review of all service providers has been completed in 2020. A general audit checklist, updated in 2021, is regularly used during regulatory inspections. It contains SMS related items such as incident reports (just culture), safety promotion, hazard log/ risk registers, change management, SPIs and safety meetings.
- 3.3.3 In 2015, ASSI conducted further assessments of the QMSs of our service providers. This formed the basis of a QMS project to improve this function across all service providers. This has fed the ongoing safety promotion plan. The elements of this are coaching reporting/ incident investigation, human factors, aerodrome operations training materials and QMS development (internal auditing) promotion. In 2023 ASSI began to conduct SMS assessment of Service Providers. Each assessment resulted in summary report that provided the Service Provider with next steps, ideas and a measure of SMS maturity.
- 3.3.4 ASSI's electronic management system allows for data storage and analysis of service provider data. The system continues to evolve, providing information to assist in moving towards a data driven risk-based system. Regulatory finding analysis indicate that QMS is still an area for improvement, that is now reflected in the NASP.



Picture 3 – Islander aircraft parked on the apron at John A Osborne International Airport Montserrat

Chapter 4 UK OT safety assurance

4.1 Safety oversight

Certification approval and licensing system

4.1.1 There are many processes employed to issue certificates, approvals, permissions and licences. These are either issued by ASSI or validated by ASSI based on the issue of such documents by another competent National Aviation Authority. These processes may include inspections and examinations. A number include time-based re-certification and re-licensing criteria.

4.1.2 The following regulations cover certification approval and licensing:

- OTAR 21 Certification of Aircraft
- OTAR 36 Aircraft Environmental Standards
- OTAR 39 Continued Airworthiness Management Approval
- OTAR 61 Pilot Licences and Ratings
- OTAR 63 Flight Engineer Licences and Ratings
- OTAR 65 Air Traffic Service Personnel Licences, Ratings and Training Organisations
- OTAR 66 Aircraft Maintenance Personnel Licensing
- OTAR 67 Medical Standards and Recognition of Medical Examiners
- OTAR 92 Carriage of Dangerous Goods
- OTAR 119 Air Operator Certification (AOC)
- OTAR 121 Commercial Air Transport Operations – Large Aeroplanes
- OTAR 125 Complex General Aviation including Corporate Operations
- OTAR 135 Commercial Air Transport Operations – Helicopters and Small Aeroplanes
- OTAR 139 Certification of Aerodromes
- OTAR 140 Rescue and Fire Fighting Services (via aerodrome certificate)
- OTAR 145 Aircraft Maintenance Organisation Approval
- OTAR 171 Aeronautical Telecommunication Services (CNS)
- OTAR 172 Air Traffic Service Organisation Requirements (ATS)
- OTAR 173 Flight Checking Organisation Approval
- OTAR 174 Meteorological Services
- OTAR 175 Aeronautical Information Services
- OTAR 176 Instrument Flight Procedures Approval
- OTAR 178 Aviation Security*
- OTAR 179 Aviation Security Training*

*Via aerodrome certificate (139), AOC (119), CNS (171) or ATS (172) approval

4.1.3 The respective OTACs provide guidance, application information and examples for service providers.

4.2 Safety oversight of product and service providers

4.2.1 Regulatory oversight is conducted through inspections and audits (see ASSI website), together with provision of advice and guidance, to ensure that industry meets the appropriate standards. Staff are specialists in the functional area which they oversee, and regulatory competencies are defined for each role within ASSI. ASSI has an electronic management system to support the planning and conduct of audits. It further assists in the management and analysis of findings with heat maps and performance indicators. This can be done across the various regulatory areas focused on each service provider.

- 4.2.2 Within some areas, expertise is pooled across the UK OTs via the Pool of Experts (PoE) mechanism. The PoE can be used to provide additional resources for oversight where required. Each expert is sponsored by an OT Regulator with specified functions, records of competency, scope of expertise and any records of work.
- 4.2.3 Ramp checks of foreign aircraft are conducted by airworthiness, safety and flight operations staff. Although not part of the programme, the ramp checks are based upon the Safety Assessment of Foreign Aircraft (SAFA) process established by the European Civil Aviation Conference (ECAC). In some Territories, the Governor has delegated limited functions to local officials to enable an abbreviated ramp checking of documentation carried on board by foreign operators and some safety items. SAFA/ Ramp checks conducted on our service providers by other authorities and ramp checks conducted by ASSI are integrated into the ASSI electronic management system. This provides improved data analysis to identify any trends and issues.
- 4.2.4 Most regulatory shortcomings are subject to corrective action through the raising of findings. An audit may also include observations where there is the potential for a non-compliance to develop if no action is taken, or there is an opportunity for a safety/ security improvement. An audit Level 2 finding is any non-compliance with a regulation or requirement or the service provider's own arrangements, processes or procedures. The corrective action timescale is normally up to 90 days and is agreed based on the associated potential safety/ security hazard. Audit Level 1 non-conformity is any non-compliance with a regulation or requirement or the Service Provider's own arrangements, processes or procedures which creates a serious safety/ security hazard. Urgent and satisfactory corrective action to mitigate the hazard is required in not more than 7 days. It may require an immediate suspension, or variation of any approval or certificate.
- 4.2.5 The enforcement process provides a structured escalation that includes the following:
- prevention of flight
 - formal meetings
 - warning letters
 - 'on notice' status
 - suspension or revocation of any approvals or certificates

In extreme circumstances, prosecution may be appropriate, see the enforcement guide graphic Appendix E.

4.3 Internal SSP review/ quality assurance

- 4.3.1 The implementation plan derived from Annex 19 and the ICAO Doc 9859 Safety Management Manual gap analysis conducted in 2013 is continuously reviewed. This formed the first set of implementation objectives that have now been superseded. ASSI's internal quality audit assurance reviews elements of the SSP, such as enforcement and oversight processes. This includes audits and periodic process reviews.
- 4.3.2 ASSI is continuously evolving its electronic management system to improve its QMS and SSP capabilities. In the SSP context this impacts on oversight audits/ findings, safety reporting, safety risk, oversight meetings and general service provider data.
- 4.3.3 Business plan, the NASP that links to safety promotion and with safety performance indicators looking to achieve the UK SSP objectives and acceptable level of safety performance have replaced the original SSP aim and objectives. Within the business plan a strategic objective is to enhance our oversight system to progress towards a risk-based approach. There are also the following SSP related business plan objectives:
- To continue to maintain efficient and effective regulatory and assessment oversight systems

- To become a risk-based organisation within an ICAO Annex 19 State Safety Programme (SSP) context
- To drive the development of effective ICAO Annex 19 Safety Management Systems (SMSs) within our directly regulated service providers
- To target safety promotion according to industry risk pictures

4.3.4 ICAO's USOAP CMA (and SSPIA) also provides for SSP review and quality assurance. The ICAO SSPIA of the UK CAA in November 2022 provided an opportunity to review the SSP development. Internal audits, for example, have examined training, ICAO compliance and our oversight procedure.

4.4 External SSP review/ audit

4.4.1 ASSI is subject to an annual UK CAA audit to assure the Department for Transport that ASSI is adequately fulfilling its role. This can examine any area of the ASSI's operation. Audits have focused on airworthiness, flight operations, auditing, and our management system. In 2015, ASSI's SSP development was evaluated. The results of this evaluation were incorporated to various SSP related work streams within the organisation. Invariably, these audits will examine SSP elements.

4.4.2 Data which measures service providers' levels of operation are collected and reviewed against the UK CAA data. Occurrence reports are relatively low in volume. Continued effort is being expended to promote 'just culture' and encouraging open reporting. In November 2017 a simplified one stop, European Coordination Centre for Accident and Incident Reporting System (ECCAIRS) compatible online reporting system was introduced and promoted.

4.5 Safety data collection, analysis and exchange

Occurrence reporting system

4.5.1 AN(OT)O article 174 establishes the requirement for mandatory occurrence reporting and OTAR 13 with its associated OTAC 13-1 provides further detail. The sole objective of occurrence reporting is the prevention of accidents and incidents, not to attribute liability or blame.

4.5.2 Mandatory occurrence reports (MORs) are reported to ASSI and are copied to the UK CAA to be stored in ECCAIRS. This software, provided by the European Commission Joint Research Centre, facilitates the pan-State collection, sharing and analysis of safety data. The UK AAIB has full access to this UK data.

4.5.3 The relatively small number of MORs submitted by the UK OTs still provides potentially valuable data to the overall UK dataset. This sharing provides many benefits for smaller scale service providers both within the UK OTs and UK. For example, both have small lifeline island service provider operations with similar aircraft types and challenges. Operators will be able to share safety data across their operations from all around the world.

4.5.4 ASSI reviews all MORs submitted where it has designated regulatory responsibilities. All relevant Inspectors and Policy staff are alerted to each MOR for review.

4.5.5 The enforcement policy (see Appendix E) provides assurance that it is ASSI's intention to nurture and sustain effective safety reporting, allowing service providers and their employees to report safety deficiencies and hazards without the fear of punitive action in the cases of unintentional errors and mistakes.

- 4.5.6 ASSI encourages voluntary reporting of incidents via the occurrence reporting process. The process combines all safety/ security occurrences, wildlife strikes, airprox, dangerous goods, and observations. There's no process differentiation between mandatory and voluntary reports and this meets the requirements of Annex 19, paragraph 5.1.3 (edition 2).
- 4.5.7 Periodically ASSI collates and disseminates a selection of UK occurrences to service providers split into flight operations and aerodromes related occurrences. Each occurrence is carefully selected to raise awareness of a range of hazards relevant to the UK OTs, provide feedback, lessons learnt and provide examples of reports made.
- 4.5.8 ASSI continues to work to improve reporting through the revised reporting process, promotion of just culture, and human performance considerations.
- 4.5.9 In accordance with AN(OT)O Article 175 any pilot-in-command of an aircraft in a UK OT who believes that their aircraft has been in collision with a bird must report it. This may be achieved by submitting a report via the ASSI website. This data is shared with the UK CAA and the relevant reports are forwarded to ICAO annually with the UK State data for inclusion in the ICAO Bird Strike Information System (IBIS).
- 4.5.10 ASSI staff and aerodrome staff participate in regional wildlife hazard management events.



Picture 4 – A Cessna 402 aircraft parked on the apron at the Captain Auguste George Airport, Anegada, BVI

4.6 Voluntary/ confidential reporting system

UK Confidential Human-Factors Incident Reporting Programme (CHIRP)

- 4.6.1 CHIRP provides a further route for voluntary reporting. The aim of CHIRP is to contribute to the enhancement of aviation safety, by providing a totally independent, confidential (not anonymous) reporting system for all individuals employed in or associated with the aviation industry. The programme accepts reports from pilots, cabin crew, ATCOs, maintenance engineers and those involved in general aviation. This programme is open to the UK OT service providers. ASSI monitors the summary publications issued by CHIRP.
- 4.6.2 CHIRP supplements other reporting systems. The submission of a CHIRP report does not fulfil the statutory obligations under the AN(OT)O for mandatory reporting.

4.7 Safety data-driven targeting of oversight areas of greater concern or need

- 4.7.1 To form a risk profile, ASSI regularly collates:
- service provider operational information
 - general UK OT data
 - foreign national aviation authority reports

- public media sourced information

- 4.7.2 Additionally, audit/ SAFA/ ramp check reports, occurrence reports, audit visit intelligence feedback, service provider hazard log information, service provider safety meeting minutes and any general day-to-day oversight data is shared in the Assurance Team Meetings and Safety Action Group Meetings. This information is used to target oversight across all regulatory disciplines within ASSI.
- 4.7.3 The electronic management system is integral to this providing data records, analysis and sharing of this information throughout the organisation. This system has been further improved to focus and collate this information on each service provider.
- 4.7.4 ASSI reviews ICAO (iSTARS), IATA and UK safety data/ publications along with industry publications. ASSI is also a member of the ICAO Regional Aviation Safety Group – Pan America and a number of other UK OT based regional ICAO safety plan meetings.



Picture 5 – Islander aircraft parked on the apron at Clayton J Lloyd International Airport Anguilla

Chapter 5 UK OT safety promotion

5.1 Internal training, communication and dissemination of safety information

Internal SSP, SMS and safety training

ASSI staff positions are assessed for required levels of competency and knowledge. For new people joining ASSI, any gaps are identified on induction and then addressed via bespoke training plans. These are then regularly reassessed and addressed through staff development goals as part of the performance management process. The staff induction process covers an overview of all areas. Many aspects of the SSP are covered in this training. ASSI Inspection and Policy staff attend the UK CAA SMS phase one and/ or phase two courses, or equivalent. Training programmes throughout the year provide refresher sessions that include many SSP aspects.

5.2 Internal communication and dissemination of safety information

5.2.1 Internal safety/ service provider information can be communicated via many forums amongst the ASSI team. The Assurance Meetings provide an opportunity to exchange such information; these are held weekly to review forthcoming and recent regulatory visits; Safety Action Group meetings are held regularly to review aviation safety risks. Any member of staff can report to or convene an additional SAG meeting if they think that there is a safety issue that needs to be discussed. ASSI is a small team working within a small open plan office which aids internal cross-discipline communications.

5.2.2 The monthly Staff Meetings and the longer all-day Quarterly Staff Meetings provide opportunities to share SSP, SMS and safety promotion information. Training events and webinars are also hosted by ASSI in conjunction with other UK OTAAAs.

5.3 External training, communication and dissemination of safety information

External SMS and SSP training/ education facilitation

ASSI facilitates regular targeted training events and webinars for both UK OTAA staff and UK OT service providers. Many components of this training are SMS and SSP related. UK OTAAAs provides some input to both the content and provision of this training. Again, the SSP implementation plan exploits such promotional activities. Where relevant, ASSI participates in regional training and conference events. Where ASSI cannot attend such events and other UK OTAAAs can they then report and feedback. Training sessions are also conducted with OTAA DCA staff at the OTSPC meeting.

5.4 External communication and dissemination of safety information

Service providers have access to the ASSI MOR summaries. ASSI also periodically provides service providers with statistical data based on reporting and findings. The ASSI website also provides information on safety related matters, SMS and the SSP. Typically, Safety Action Group (SAG) actions result in direct contact with Service Providers to engage on relevant safety matters. ASSI operates an e-mail alert system to which both OTAAAs and service providers can sign up to be advised of the availability of new or updated material. ASSI has a regulatory publication process that provides service provider feedback with impact assessments. ASSI works continuously to allow service providers direct and easy access our electronic management system to allow them to provide and access information about their operation. Due to the small number of Service Providers in most cases urgent safety information can be provided directly to each.



Picture 6 – An Islander aircraft parked on the apron at Stanley Airport, Falkland Islands (ASSI is designated by the Falkland Islands Governor to oversee ICAO Annexes 6, 8 and 10 within the Falkland Islands)

Chapter 6 Summary

- 6.1 ASSI is committed to continuously improving the SSP. This is a live document and is periodically updated. The gaps identified within the ICAO SSP analysis conducted in 2013 have either been addressed (see Appendix C), or are covered by actions underway, or planned within the NASP.
- 6.2 As service providers may have to revise and adapt their SMS processes to make them more efficient there are times where this occurs with this SSP, so it is always evolving.
- 6.3 ASSI welcomes any questions, contributions, or comments at: enquiries@airsafety.aero.
- 6.4 For any further information on ASSI please visit the ASSI website at: www.airsafety.aero.

Appendix A Air Safety Support International (ASSI) Safety Policy



ASSI promotes the safety of aviation in the UK Overseas Territories and, where designated by H. E. the Governor of the Territory, regulates aviation safety and security¹. Where not designated, ASSI conducts assessments of the Overseas Territories Aviation Authority (OTAA). In consultation with the OTAA's and industry, ASSI produces requirements and guidance for service providers² to meet the International Civil Aviation Organisation (ICAO) Standards and Recommended Practices.

Policy

ASSI is committed to further developing, implementing and improving an appropriate regulatory framework, plans and processes to ensure that aviation within the UK Overseas Territories is able to achieve the highest practicable level of safety performance.

To this end, in cooperation with the OTAA's, ASSI will work towards:

- 1) setting and maintaining standards that are in line with the ICAO's Standards and Recommended Practices and Procedures;
- 2) adopting an appropriate data driven approach to safety regulation, service provider oversight and, where appropriate, OTAA assessments;
- 3) fostering safety reporting and promoting just culture;
- 4) encouraging safety information collection, analysis and exchange amongst all relevant industry organisations and service providers, with the intent that such information is to be used for safety management improvement purposes only;
- 5) collaborating and consulting with relevant aviation stakeholders to address safety and regulatory matters to enhance aviation safety;
- 6) allocating sufficient financial and human resources to support this policy;
- 7) equipping ASSI and supporting OTAA staff with the skills and expertise to discharge their safety oversight and management responsibilities.

Specifically, where ASSI is designated, ASSI will work towards:

- 8) a data driven approach to address areas of greatest safety concern or need;
- 9) the improvement of our safety performance indicators as well as supporting service providers' safety performance indicator improvement to continuously monitor and measure the safety performance of our aviation system;
- 10) promoting good safety practices with a positive safety culture within the service providers based on sound safety management principles supported by our enforcement policy and procedures that protect our safety data.

M P Bayle

CEO Air Safety Support International

¹ ASSI views aviation security as an integral part of aviation safety

² Service Provider as defined ICAO Annex 19 Second Edition Chapter 3 para 3.3.2.1 a) - f)

Appendix B Policy Statement 47 – Enforcement

The following is **NOT** the Master copy. Please check latest version of this policy on the Air Safety Support International website – Click [here](#)

POLICY STATEMENT 47 | Enforcement

UNCONTROLLED DOCUMENT WHEN PRINTED

Effective date of Implementation: 06/07/2015

ASSI File Reference:UK/X/J/86/02 – Policy Statements

Rationale:

Basic legislative enforcement provisions have in some cases been concerned with imposing penalties for violations within the service provider or by the regulator. In an SSP-SMS environment, it is intended that enforcement policies and procedures, of both the individual service provider and regulator, take account of the actual conditions and circumstances surrounding a violation or act of non-conformance. The intent is to ensure that a distinction is made between an unintentional error or mistake and a deliberate or gross violation.

Service providers are expected to have an acceptable process in place to manage their own routine safety and quality non-conformances. Regulatory intervention can be expected under certain conditions and circumstances in which the designated regulator will actively investigate a particular violation or non-conformance.

This enforcement policy is aimed at promoting compliance with aviation safety regulations and requirements through enforcement functions in an equitable manner designed to support the implementation of SMS. The policy and related procedures allow service providers to deal with, and resolve, certain events internally to the satisfaction of the regulator, within the context of a service provider's SMS. This approach aims to nurture and sustain effective safety reporting, whereby service providers' employees can report safety deficiencies and hazards without fear of punitive action. A service provider can therefore, without apportioning blame and without fear of enforcement action, analyse the event and the organisational or individual factors that may have led to it, in order to incorporate remedial measures that will best help prevent recurrence. Intentional contraventions of legislation and related Overseas Territories Aviation Requirements (OTARs) will be investigated and may be subject to conventional enforcement action where appropriate, with due consideration to distinguishing between unintentional errors or non-compliances and premeditated violations.

For the purposes of this policy, service providers are holders of certificates, approvals, permissions, authorisations or similar documents issued under the Order.

Policy Statements:

1. Information derived from safety data collection and processing systems established under an SMS relating to reports classified as confidential, voluntary or equivalent shall not normally be used as the basis for enforcement action.
2. When a service provider, operating under an SMS, unintentionally contravenes the requirements, the regulator will engage in dialogue with the organisation. The objective is to agree on proposed corrective measures and an action plan that adequately addresses the deficiencies that led to the contravention and to afford the service provider a reasonable time dependent on the risks to safety to implement them.

3. If the regulator considers the corrective measures proposed satisfactory, likely to prevent recurrence and foster future compliance, there will be no further enforcement action by the regulator. Where either the corrective measures or the systems in place are considered inappropriate, the regulator will continue to interact with the service provider to find a satisfactory resolution that would negate the need for enforcement action. However, in cases where the service provider refuses or is unable to engage with the regulator, to address the event and to provide effective corrective measures, the regulator will consider taking enforcement action as deemed appropriate.
4. Breaches of requirements may occur for many different reasons, ranging from a genuine misunderstanding of the regulations to disregard for aviation safety. Enforcement decisions must be proportional to the identified breaches and the underlying safety risks, based on the following principles:
 - a) action will be taken against those who deliberately or consistently operate outside the requirements;
 - b) the regulator will seek to educate and promote training or supervision of those who show commitment to resolving safety deficiencies; and
 - c) the regulator will give due and equitable consideration to distinguish unintentional errors or non-compliances from premeditated violations.
5. Enforcement actions may include:
 - a) counselling;
 - b) remedial training;
 - c) variation, suspension or revocation of a certificate, approval or authorisation; or
 - d) prosecution as provided for in the applicable legislation.
6. Enforcement decisions must not be influenced by:
 - a) personal conflict;
 - b) personal gain;
 - c) considerations such as gender, sexual orientation, race, religion, political views or affiliation; or
 - d) personal, political or financial power of those involved.
7. Enforcement decisions must:
 - a) be fair and follow due process;
 - b) be transparent to those involved;
 - c) take into account the circumstances of the case and the attitude and actions of the service provider or individual when considering action;
 - d) be consistent actions or decisions for like or similar circumstances; and
 - e) be subject to appropriate internal review.

Appendix C ICAO Document 9859 edition 3 SSP gap analysis initially conducted November 2013 OTSPC, updated: August 2023 (ICAO iSTARS 2019 questions)

Key:

Additional question (2019)

Minor text change to question (2019)

Question removed (2019)

UK – UK State, answered where applicable

ASSI – Air Safety Support International, answered where applicable

ASSI D – Air Safety Support International Direct Regulation (UK OTs where designated by the Governor of that UK OT), answered where applicable

Answer: Y = Yes

N = No

P = Partial

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
1.1-01	2	Has [State] established a national aviation legislative framework that addresses the proactive management of safety in the State?	UK	Y	Y	UK CAA SSP website pages are available online they describe the UK and OT structure.
			ASSI	Y	Y	Yes, this is done through UK Civil Aviation Act, UK Air Navigation Order (Overseas Territories) Order 2013, Overseas Territories Aviation Requirements (OTARs) Outlined in: State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document describes. The Laws and Regulation in the UK Overseas Territories document (ASSI website). The UK CAA SSP website pages note the UK OTs structure.
1.1-02	2	Are the legislative framework and specific regulations periodically reviewed to ensure that they remain relevant to the State?	UK	Y	Y	
			ASSI	Y	Y	These are reviewed via many trigger events such as when directed by the UK Department for Transport, on review of State letters, feedback from other UK Overseas Territory Aviation Authorities/ Service Provider staff and following training events. Periodic reviews are tracked in Centrik Document system.
1.2-01	1	Has [State] identified the organization that is responsible for coordinating the maintenance and implementation of the SSP?	UK			
			ASSI			
			ASSI D	Y	Y	In the context of Air Safety Support International's (ASSI) direct regulation function this is the ASSI working in conjunction with the UK CAA and UK Department for Transport.
1.2-02	1	Has [State] established an SSP coordination group responsible for the implementation and maintenance of the SSP?	UK			
			ASSI			
			ASSI D	Y	Y	This is managed by the ASSI Safety Performance & Risk Manager with the ASSI management team through the usual organisational meetings, assurance and business plan processes.
1.2-03	1	Has [State] identified, defined and documented the State requirements, obligations, functions and activities regarding the establishment and maintenance of the SSP?	UK			
			ASSI			
			ASSI D	Y	Y	This is implicit within the UK DfT Directions creating ASSI within the ASSI job descriptions and State Safety Programme for the UK Overseas Territories Anguilla, BVI, Montserrat and St. Helena document.
1.2-04	1	Does State have an SSP implementation plan in place, which includes the timing and sequencing of key tasks and responsibilities?	UK			
			ASSI			
			ASSI D	Y	Y	There was an implementation plan in place. A gap analysis was conducted in November 2013 based on the then new ICAO 9859 document gap analysis here. This was used as the basis for the plan. It forms the basis for our original Aim and Objectives, which were regularly reviewed. There are only a few areas left to address in this and this is done through our usual business planning and risk processes.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
1.2-05	1	Is there a documented statement about the provision of the necessary resources for the implementation and maintenance of the SSP?	UK			
			ASSI			
			ASSI D	Y	Y	This commitment is stated in the ASSI Safety Policy signed by the ASSI CEO which is regularly reviewed.
1.2-06	1	Are the organizations involved in the implementation and maintenance of the SSP provided with the necessary resources?	UK			
			ASSI			
			ASSI D	Y	Y	Yes, through our organisational set up, budgeting mechanisms, business planning and risk processes so the CEO along with Governors can ensure this.
1.2-07	1	Has [State] defined the specific activities and responsibilities related to the management of safety in the State for each aviation authority?	UK	Y	Y	UK CAA SSP website pages describe this online.
			ASSI	Y	Y	This is covered in the State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document.
			ASSI D	Y	Y	As above
1.2-08	1	Does [State] have a mechanism or platform for the coordination of SSP implementation and subsequent SSP continuous monitoring activities involving all State regulatory organizations?	UK			
			ASSI			
			ASSI D	Y	Y	ASSI is assessed by and works alongside the UK CAA. The SSP is under constant review by the ASSI Safety Performance & Risk Manager. The implementation plan and activities are peer reviewed at the Overseas Territories Safety Performance Council that occurs every 6 months.
1.2-09	1	Does the head of organization responsible for the implementation and maintenance of the SSP coordinate the activities of the different State aviation organizations under the SSP?	UK	Y	Y	UK CAA SSP website pages describe this online.
			ASSI	Y	Y	Yes, in conjunction and on behalf of the Governors.
			ASSI D	Y	Y	As above, the ASSI CEO, COO and Safety Performance & Risk Manager regularly meets with the UK Department for Transport and other State organisations. In addition, the ASSI Safety Performance & Risk Manager meets with the UK CAA and the UK CAA SSP leads.
1.2-10	1	Has [State] established a safety policy?	UK	Y		UK CAA SSP website pages describe this online.
			ASSI	Y	Y	Yes, regularly revised, published on website and the State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document.
			ASSI D	Y	Y	As above
1.2-11	1	Is [State] safety policy endorsed by the State aviation authorities?	UK			
			ASSI	N	Y	ASSI CEO
			ASSI D	N	Y	Yes, signed by the ASSI CEO.
1.2-12	1	Is [State] safety policy reviewed periodically?	UK			
			ASSI	N	Y	Periodically, reviewed with this document.
			ASSI D	N	Y	As above
1.2-13	1	Is [State] safety policy communicated to the employees in all [State] aviation organizations with the intent that they are made aware of their individual safety responsibilities?	UK			
			ASSI	N	Y	The policy is visible in the ASSI office, it is posted on the ASSI website, discussed with Service Providers (August 2014/ promoted 2017) and staff were all consulted on the content at the last review August 2023. It supports the current business plan. It is also available via the IT system documents and State Safety Programme for the UK Territories Anguilla, BVI, Montserrat and St. Helena document.
			ASSI D	N	Y	As above.
			UK	Y	Y	UK CAA SSP website pages describe this online.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
1.2-14	1	Has the [State] initiated the SSP documentation to describe the structure of the SSP and associated programmes, how the various components work together as well as the roles of the different State aviation authorities?	ASSI			
			ASSI D	P	Y	This is the State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document.
1.2-15	1	Has the SSP documentation been completed, approved and communicated/ made accessible to all stakeholders?	UK ASSI			
			ASSI D	P	Y	The State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document is placed on the ASSI website. The document is signed by the CEO. Promoted with Service Providers in 2017.
1.2-16	1	Does [State] have a documentation system that ensures appropriate storage, archiving, protection and retrieval of all documents relating to SSP activities?	UK ASSI			
			ASSI D	P	Y	The ASSI revised website, server (SharePoint) and IT Centrik management system provides this.
			ASSI D	P	Y	As above
1.2-17	1	Does [State] have a periodic internal review mechanism for assurance of continuing improvement and effectiveness of its SSP?	UK ASSI			
			ASSI D	Y	Y	Each year ASSI is assessed by the UK CAA. SSP review conducted by CAA August 2015. The Overseas Territories Safety Performance Council reviews the SSP. The plan is reviewed internally each year with the revision of the State Safety Programme for the UK Overseas Territories of Anguilla, BVI, Montserrat and St. Helena document. Most of the implementation areas have been addressed. ICAO protocol questions (including the SSP implementation assessment questions) have been completed and will be regularly reviewed. ASSI observed the UK CAA ICAO SSPIA and conducted a mini SSP review based on lessons learnt from this in 2023.
1.2-18	1	Does the State periodically review specific operating regulations, guidance material and implementation policies to ensure they remain relevant and appropriate?	UK ASSI		Y	As below
			ASSI D		Y	Yes, this process has been improved with tracking and alert updates through our Centrik document management. It follows ASSI Procedure 10.
1.2-19	1	Has [State] assessed the organizational structure to determine if any changes are needed to support the implementation and maintenance of the SSP?	UK ASSI		Y	As below
			ASSI D		Y	Yes, this is done through the ASSI business planning and business risk process. The Safety Performance and Risk Manager.
1.3-01	2	Has [State] established an independent accident and incident investigation process the sole objective of which is the prevention of accidents and incidents and not the apportioning of blame or liability?	UK ASSI	Y	Y	UK DfT AAIB
			ASSI D	Y	Y	Each Overseas Territories Governor has created regulations under Section 75 of the Civil Aviation Act 1982, so they can appoint investigators. Each Territory appoints the UK Chief Inspector of the Air Accident Investigation Board. The independent UK AAIB fulfils this function.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
1.3-02	2	Is the organization/authority for accident investigation functionally independent (see the <i>Manual of Aircraft Accident and Incident Investigation</i> (Doc 9756, Part I, 2.1)?	UK	Y	Y	UK DfT AAIB
			ASSI			
			ASSI D	Y	Y	The UK AAIB is fully independent.
1.4-01	2	Has [State] promulgated an enforcement policy?	UK			
			ASSI			
			ASSI D	P	Y	Yes, this has been revised in line with Annex 19 Second Edition and ICAO document 9859 Fourth Edition. Policy statement 47, available from website. Promoted with Service Providers during 2017.
1.4-02	2	Does [State] primary aviation legislation provide for the enforcement of the applicable legislation and regulations?	UK			
			ASSI	Y	Y	Yes, the Civil Aviation Act 1949 (Overseas Territories) Order 1969 Part 2 Section 8 makes provision for the creation and maintenance of the Air Navigation (Overseas Territories) Order.
			ASSI D			
1.4-03	3	Does the enforcement policy take into account that service providers are normally allowed to deal with, and resolve, routine safety or quality deviations internally within the scope of their approved SMS/QMS procedures?	UK			
			ASSI	P	Y	Yes, this is within enforcement policy 47, enforcement procedure 70 and enforcement guidance information papers 159/160.
			ASSI D	P	Y	As above
1.4-04	3	Does the enforcement policy specify the conditions and circumstances under which SPs with an SMS are allowed to deal with, resolve events involving certain safety issues internally, within the context of SMS and to the satisfaction of the State authority?	UK			
			ASSI	Y	Y	Yes, this is within enforcement policy 47, enforcement procedure 70 and enforcement guidance information papers 159/ 160.
			ASSI D	Y	Y	As above
1.4-05	3	Does the SSP enforcement policy include provisions to prevent the use or disclosure of safety data for purposes other than safety improvement?	UK			
			ASSI	P	Y	Yes
			ASSI D	P	Y	Yes, this is within policy 51 safety data/ information protection, sharing and exchange, enforcement policy 47, procedure 70 and enforcement guidance information papers 159/ 160.
1.4-06	3	Does the SSP enforcement policy include provisions to protect the sources of information obtained from voluntary incident reporting systems?	UK			
			ASSI	P	Y	Yes
			ASSI D	P	Y	Yes, this is contained/ followed within policy 51 safety data/ information protection, sharing and exchange, enforcement policy 47, procedure 70 and enforcement guidance information papers 159/ 160, occurrence reporting procedure 08 and occurrence reporting system information paper 164.
1.5-01	1	Has the State provided guidance to the industry on the initial review and acceptance of a service provider's SMS?	UK			
			ASSI			
			ASSI D		Y	Yes, this information is on the ASSI website evaluating and accepting an SMS along with the SMS reviewer checklist (Centrik regulatory audit checklist 44).

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
1.5-02	1	Has the State established inspector procedures for the initial review and acceptance of a service provider's SMS?	UK ASSI			
			ASSI D		Y	Where an SMS is required the completion the SMS checklist green items is required.
2.1-01	2	Has the State promulgated harmonised regulations to require service providers to implement an SMS?	UK ASSI			
			ASSI D	P	Y	The AN(OT)O requires SMS implementation. A standardised requirement text has been established based on Annex 19. The regulations (OTARs) for each particular area contain this common SMS requirement text.
2.1-02	3	Are these SMS requirements and related guidance material periodically reviewed to ensure they remain relevant and appropriate to the service providers?	UK ASSI			
			ASSI D	Y	Y	As part of usual OTAR/ OTAC reviews. SMS OTAC last revised July 2023. This is managed in the Centrik IT management system documents.
2.2-01	4	Has [State] accepted individual service provider's safety performance indicators and their respective target levels?	UK ASSI			
			ASSI D	N	Y	Following training sessions in 2020 each Service Provider created a set of SPIs and targets, where applicable. These targets are mostly to maintain, or a direction to increase, or decrease.
2.2-02	4	Are the accepted safety performance indicators appropriate to the individual service provider's specific operational context?	UK ASSI			
			ASSI D	N	Y	The SPI training sessions and follow up in 2020 ensured this was the case.
2.2-03	4	Does the State monitor the safety performance of the service provider?	UK ASSI			
			ASSI D	P	Y	This is mainly conducted through auditing, SMS reviews, periodic safety data requests, occurrence reporting and regular telecons. Now all SPIs have been agreed in 2020 these are now included.
2.2-04	2	Have the international general aviation (IGA) operators implemented SMS in accordance with Annex 19?	UK ASSI			
			ASSI D		Y	Our only 125 Operator is I-BAC registered and has passed an IS-BAO audit of their SMS.
2.2-05	2	Have all the approved training organizations in the State, in accordance with Annex 1, implemented SMS?	UK ASSI			
			ASSI D		Y	Yes, there are none in our UK OTs.
2.2-06	2	Have all the operators of aeroplanes or helicopters, in the State, authorized to conduct international commercial air transport, in accordance with Annex 6, Part I or Part III, Section II, implemented SMS?	UK ASSI			
			ASSI D		Y	Yes, SMS Manuals are reviewed, and SMS functions are reviewed on audit.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
2.2-07	2	Have all the approved maintenance organizations, in the State, providing services to operators of aeroplanes or helicopters engaged in international commercial air transport, in accordance with Annex 6, Part I or Part III, Section II, implemented SMS?	UK			
			ASSI			
			ASSI D		Y	Yes, those who hold an option 2 approval. SMS Manuals are reviewed, and SMS functions are reviewed on audit. Option 1 approvals are dependent on the State of the base approvals SMS requirement.
2.2-08	2	Have all the approved organizations, in the State, responsible for the type design or manufacture of aircraft, engines or propellers in accordance with Annex 8, implemented SMS?	UK			
			ASSI			
			ASSI D		Y	Yes, not applicable, there are none
2.2-09	2	Have all the approved organizations, in the State, responsible for the air traffic services (ATS) providers in accordance with Annex 11 implemented SMS?	UK			
			ASSI			
			ASSI D		Y	Yes, SMS Manuals are reviewed, and SMS functions are reviewed on audit.
2.2-10	2	Have all the approved organizations, in the State, responsible for the operators of certified aerodromes in accordance with Annex 14, Volume I, implemented SMS?	UK			
			ASSI			
			ASSI D		Y	Yes, SMS Manuals are reviewed, and SMS functions are reviewed on audit.
2.3-01	2	Has [State] assigned or delegated the task of analyzing the safety data and safety information from the SDCPS and associated safety databases to appropriately trained and qualified personnel?	UK			
			ASSI			
			ASSI D		Y	Safety Team analyses/ reviews findings, ramp check findings, occurrence reports, Inspector feedback, operational data and publications. The Safety Performance & Risk Manager has completed both ICAO courses and UK CAA course in this area of work. This work is assisted by ECCAIRS/ PowerBI trained colleagues within ASSI.
2.3-02	2	Has the State established a process for the assessment of safety risk	UK			
			ASSI			
			ASSI D		Y	Managed through the Safety Risk Procedure 76, and the Safety Action Group and the Assurance Meeting. This was revised in 2023 to directly link into occurrence and finding data, where each are ARMS ERC score assessed.
2.3-03	2	Has the State established a process for the mitigation of safety risks?	UK			
			ASSI			
			ASSI D		Y	Managed through the Safety Risk Procedure 76, and the Safety Action Group, Assurance Meeting and general oversight.
3.1-01	2	Has [State] established a formal surveillance programme to ensure satisfactory compliance by service providers with State safety regulations and requirements?	UK			
			ASSI			
			ASSI D	Y	Y	Yes, currently by an audit and approval process. This is managed with records within the Centrik system.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
3.1-02	4	Has [State] established a process for the initial review and acceptance of an individual service provider's SMS?	UK			
			ASSI			
			ASSI D	P	Y	Yes, described on ASSI website. Following the revision of the SMS OTAC April 2016 a SMS checklist has been aligned and created. This checklist sets out items to be set up pre-operation (green items) and additional items to be checked once operational. This has been used a number of times to evaluate current, revised and new SMSs.
3.1-03	4	Has [State] established procedures for the review of individual service provider's safety performance indicators and their relevant alert/target levels?	UK			
			ASSI			
			ASSI D	N	Y	Following our 2020 SPI training sessions with Service Providers these are now agreed. Reviewing these is to form part of the general audit checklist (part of Procedure 25A) for each audit, these will be tracked and requested for review each year with the Operator data request. There are no alert/ target levels just directions of travel or maintain.
3.1-04	4	Does the State's surveillance programme include an assessment of the effectiveness of the service provider's SMS?	UK			
			ASSI			
			ASSI D	P	Y	The audit general checklist covers reporting, the risk registers and any changes to the Service Provider. This checklist now includes from 2021 the SPIs, and a periodic complete SMS review with an ongoing version of the established SMS checklist. General SMS performance questions are in development for use in and as part of specialist area audits. An SMS review of most Service Providers was conducted in 2023.
3.1-05	4	Does the State's SMS monitoring programme include review of service provider's hazard identification and safety risk assessment processes?	UK			
			ASSI			
			ASSI D	P	Y	This is reviewed within the current audit process. Training carried out during 2021 in this area. Each audit reviews a Service Provider's hazard log and processes. The 2019/ 20 SMS Manual review includes a review of this process which has been checked in 2020 audits, particularly in relation to a number of Covid-19 issues of that time.
3.1-06	4	Does the State's SMS monitoring programme include a periodic review of service provider's safety performance indicators and associated target levels to ensure they remain acceptable to the State?	UK			
			ASSI			
			ASSI D	N	P	Following the SPI training sessions in 2020, in 2021 the SPIs have become part of the general audit checklist and Service Providers submit these as part of their annual operational data.
3.1-07	4	Does [State] have a periodic internal review mechanism for assurance of effective compliance of the SSP and its related safety oversight functions?	UK			
			ASSI			
			ASSI D	N	Y	This is currently via a review by the Overseas Territories Safety Performance Council review, staff performance and business plan reviews. Both UK CAA and the ASSI Board reviews ASSI's progress against this. CAA reviewed SSP in specific 2015 audit of ASSI. Several reviews monitor our oversight function performance.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
3.2-01	3	Has the State established a Safety Data Collection and Processing System (SDCPS) to capture, store, aggregate and enable the analysis of safety data and safety information?	UK	Y	Y	Current UK ECCAIRs
			ASSI	Y	Y	As above
			ASSI D	Y	Y	This is collected via the ASSI website, audits and surveys; it is stored in the ASSI Centrik management system for processing. Processing, investigation, findings, records and analysis are all managed through the system spreadsheet and PowerBI analysis.
3.2-02	3	Has the State established a voluntary safety reporting system to collect safety data and safety information not captured by mandatory safety reporting systems?	UK	Y	Y	Both mandatory and voluntary systems the same ASSI Centrik management reporting system. UK CHIRP has also been promoted.
			ASSI	Y	Y	As above
			ASSI D	Y	Y	As above
3.2-03	3	Has [State] established and maintained a process to analyse the safety data and safety information from the SDCPS and associated safety databases?	UK			
			ASSI			
			ASSI D	N	Y	The information is shared throughout the UK State and elsewhere via ECCAIRs. Service Provider MOR summary and SAG meeting outputs shares data. Service Provider ECCAIRs access to be developed with UK CAA. A summary report is created and provided to Service Providers periodically. Audit, occurrence and operational data is analysed using PowerBI.
3.2-04	4	Has [State] established an acceptable level of safety performance (ALoSP) as defined by selected safety indicators with corresponding target and alert levels as appropriate?	UK			
			ASSI			
			ASSI D	N	Y	The ALoSP aligns with the UK State. This was promoted to Service Providers in 2018 and shared with other relevant stakeholders. The NASP, has been promoted, superseded with new SPIs to support this ALoSP. These have been created based on the last few years data aligning with the RASP and GASP.
3.2-05	4	Are the ALoSP safety indicators appropriate and relevant to the scope and complexity of the aviation activities?	UK			
			ASSI			
			ASSI D	N	Y	The revised SPIs are based on UK OT activity and the last few years data.
3.2-06	4	Does the State have a mechanism for periodic monitoring of the SSP safety performance indicators to assure that corrective or follow up actions are taken for any undesirable trends, or if safety performance targets are not achieved?	UK			
			ASSI			
			ASSI D	N	Y	Our SSP SPIs are monitored, with actions taken where required. Both business and safety risk processes monitor ASSI's work in this area. The safety risk process, revised in 2023, uses both occurrence and finding data.
3.3-01	4	Has [State] developed a risk-based surveillance programme to prioritize inspections, audits and surveys towards those areas of greater safety concern or need?	UK			
			ASSI			
			ASSI D	P	Y	Procedure 25A gathers data from various sources to facilitate a risk-based oversight process. Findings, occurrence data, operational data and sources are used. Safety action group and assurance meetings assist in creating priorities, audit periodicity and focus areas.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
3.3-02	4	Is the prioritization of inspections and audits associated with the analysis of relevant internal/external safety or quality data?	UK			
			ASSI			
			ASSI D	N	Y	Procedure 25A gathers data from various sources to facilitate a risk-based oversight process. Findings, occurrence data, operational data and sources are used. Safety action group and assurance meetings provide assistance in creating priorities, audit periodicity and focus areas.
4.1-01	1 2 3 4	Is there a process to identify safety-management-related training requirements, including SSP and SMS training, for relevant personnel of the regulatory/administrative organizations?	UK			
			ASSI			
			ASSI D	P	Y	The current staff competency, induction and development process reviews this. Staff currently attend the UK CAA SMS training, and some have attended the UK CAA enhanced safety performance training. Staff quarterly training sessions address various aspects of SSP and SMS training elements.
4.1-02	1 2 3 4	Has [State] developed and approved an SSP training plan for the personnel involved in the implementation and maintenance of the SSP?	UK			
			ASSI			
			ASSI D	P	Y	SSP/ SMS elements are within competencies and recorded in training records for those with roles in these areas. The SSP forms part of induction training. Periodic training in elements of both are regularly conducted usually as part of staff quarterly meetings.
4.1-03	1 2 3 4	Does the State maintain a mechanism for the consolidation, communication and sharing of safety information amongst its authorities involved in the SSP?	UK			
			ASSI	Y	Y	This is conducted through the Overseas Territories Safety Performance Council, its sub-committee, ASSI Board, DfT meetings, UK CAA meetings, safety action group, assurance and staff meetings. Plus, regular conference call set up with other OTAA's. There are also training sessions, and webinars.
			ASSI D	Y	Y	As above.
4.1-04	1 2 3 4	Does the internal safety information/data sharing include occurrence, investigation and hazard reports from all of the State's aviation sectors?	UK			
			ASSI	P	Y	Reporting data is shared among staff, hazard reports and safety information are also shared during Assurance and the safety action group meetings of Inspection and Policy staff. All staff have access to the data contained with the Centrik management system. Plus, PowerBI dashboards.
			ASSI D	P	Y	As above.
4.1-05	4	Has the State established formal communication channels between the members of the SSP Coordination Group (State entities involved in implementing and maintaining the SSP)?	UK			
			ASSI			
			ASSI D		Y	Yes, OTSPC, UK CAA, DfT and other agencies as required. There is regular contact between all these.
4.1-06	4	Has State identified the competencies required to perform the activities as part of the implementation and operation of the SSP?	UK			
			ASSI			
			ASSI D		Y	Yes, ASSI have set competencies for their job roles that include SSP tasks.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
4.1-07	4	Has [State] updated existing job descriptions to include safety management competencies and activities related to SSP implementation and maintenance?	UK ASSI			
			ASSI D		Y	Yes, Safety Performance & Risk Manager and Regulatory Inspection staff.
4.2-01	1 2 3 4	Does the State promote sharing and exchange of safety information with and amongst its service providers?	UK ASSI			
			ASSI D	P	Y	Service Providers have access to UK CAA safety data reports through their contributions, and on request. This can be done via training events for Service Providers (ATS Unit Competency Scheme training), PBN implementation training and through oversight visits. Service Providers have access to the ASSI Safety Performance & Risk Manager and the Safety/ MOR Bulletins/ annual summary (State Safety Plan our data) both of which facilitates the exchange of safety data. Service Providers are encouraged to participate in safety meetings and regional events.
			ASSI D	P	Y	As above.
4.2-02	1 2 3 4	Does the State regulatory authority participate in regional and global aviation safety information sharing and exchange, and facilitate the participation of their respective service providers?	UK ASSI			
			ASSI	P	Y	Conducted mainly through the UK State. ASSI actively works with relevant ICAO regional activities local to the UK OTs and looks to work with neighbouring aviation authorities to share safety data. ASSI are represented on the ICAO RASG-PA, SSP implementation meetings hosted by the North American, Central America and Caribbean regional and attend the ICAO North American, Central America and Caribbean regional DCA conferences. ASSI also contributes and participates in the Eastern Caribbean Regional Technical Cooperation Meetings. Occurrence data is shared with the UK CAA ECCAIRS.
			ASSI D	P	Y	As above
4.2-03	1 2 3 4	Is there a formal process for the external dissemination of regulatory documents and information to service providers and a means of assuring the effectiveness of this process?	UK ASSI			
			ASSI	P	P	First part Yes, but the assurance of effectiveness No. There is a process to externally disseminate regulatory document and information. The electronic management system Centrik aims to improve the monitoring of effectiveness, although this will take time to establish to provide results. System update request has been submitted.
			ASSI D	P	P	As above
4.2-04	1 2 3 4	Is [State] SSP document and its associated safety policy, enforcement policy and aggregate safety indicators included in the State's safety information communication and sharing process?	UK ASSI			
			ASSI D	N	Y	SSP document contains this information.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered	Use of the term State (Context)	2013	2023	Status/ Justification
4.2-05	4	Has the State established safety promotion channels and media to support the promotion of a positive safety culture?	UK			
			ASSI			
			ASSI D		Y	Yes, various. NASP, MOR summary, safety summary (State Safety Plan our data), seminars/ workshops, website, general audit checklist, regular telecons with Service Providers etc...Occurrence reporting follow up also includes elements of this. Throughout 2020/ 21 increased regular contact has been conducted with online calls which has proved useful in safety promotion, particularly with safety culture discussions.
4.2-06	4	Does the State assess the effectiveness of its safety promotion channels and media to ensure they are appropriate to convey each message to its targeted audience?	UK			
			ASSI			
			ASSI D		Y	Yes, constantly. Checked on audit through General Checklist, audit finding review and report reviews.

Appendix D Aviation in ASSI's fully designated UKOTs

Anguilla

Anguilla is relatively flat in terms of terrain with the highest elevation being 231ft. With a population of around 16,000 people, it is situated 5 nautical miles north of the Dutch (St. Maarten) and French (St. Martin) Overseas Territories in the Eastern Caribbean. St. Maarten has a large international aerodrome that is served by several European long haul, US/ Canadian medium haul, and regional Caribbean flights. St. Martin has a smaller aerodrome that caters for a few regional Caribbean flights and is the base for a parachuting operation. Anguilla and St. Martin are connected by regular sea ferry services.

Anguilla has one aerodrome that is certified with one paved runway (1663x30m) resurfaced and grooved in 2021; each end is served by an RNP approach and is available for night operations. St Maarten ATC manages traffic into and out of Anguilla handing this over to and from Anguilla ATC. The airspace sits under the US San Juan Flight Information Region who control the upper airspace. Despite the relatively low elevations found on the main island there are some obstacle penetrations of the approach to the predominantly used runway. The aerodrome has introduced in 2019 a combined service building with a new control tower with two new Rescue Fire Fighting Service (RFFS) vehicles and rescue boat being purchased.

Anguilla is served by a few scheduled air services linking to neighbouring islands, and there are a few regular cargo/ parcel flights using small piston/ turboprop aircraft. It has a direct US service to Miami. The aerodrome is extremely busy around the Thanksgiving and Christmas period with numerous private and charter executive aircraft, but it is limited by apron space. Some aircraft that cannot park at the more limited St. Maarten position to Anguilla to park during this period. Anguilla has three locally based small airlines (OTAR Part 135 operations) operating small single crew twin-engine propeller aircraft. There are two UK OT 145 approved maintenance facilities based in Anguilla, since 2021 these provide maintenance to all UKOT Eastern Caribbean operators.

British Virgin Islands

BVI consists of over 50 islands with a population of just under 30,000 people. Located in the Eastern Caribbean alongside the US Virgin Islands that has an international aerodrome that is served by several medium haul US flights and regional Caribbean flights. The islands are connected by regular sea ferry services.

BVI has three aerodromes, and a heliport, that are certified. The main aerodrome on Beef Island (Tortola) has one paved runway (1416x30m), this runway has an RNP approach at each end and is available for night operations. Only this aerodrome has an ATC service and control zone, initial approaches are managed by San Juan ATS.

Both runway ends are limited by the sea. The runway was resurfaced and grooved in 2019 and two new Rescue Fire Fighting Service (RFFS) vehicles were purchased in 2021. The local topography around Beef Island is hilly with the highest peak being 1739ft, the runway is just above sea level. This means, for the predominant runway, a curved approach is flown almost to touchdown and on departure a turn is also required due to high ground ahead.

Beef Island has several scheduled services linking to other islands within the Caribbean region. These are operated by piston, turboprop and jet aircraft with up to 80 seats. There are also a few regular cargo/ parcel operations using piston and turboprop aircraft linking to neighbouring islands. There are also regular executive jet operations.

Virgin Gorda has one runway (937x18m) just above sea level that is mainly unpaved. It has no instrument procedures and is daytime only.

Both runway directions require a curved approach due to terrain with a prevailing crosswind blowing towards the terrain. This island is hilly with the highest point being 1371ft. Experience requirements, applied through the Governor's Instruction, are placed on pilots operating to this aerodrome. Cessna 402 type aircraft mainly operate here, this aircraft type requires some modifications to enable short runway operations. There is also a certified heliport.

Anegada has one paved runway (820x18m) at around sea level with no instrument procedures and is daytime only. Anegada is a flat island with the highest elevation of 28ft. Mainly small C402 type aircraft operate to this aerodrome.

There are US and Turks and Caicos operator's aircraft based at Beef Island with some FAA maintenance facilities. The maintenance facilities have still not been recovered from the September 2017 hurricanes.

Montserrat

This active volcanic island is situated around 22nm southwest of Antigua in the Eastern Caribbean with a population of just under 5,000 people. Nearby Antigua has an international aerodrome that is served by long haul flights to Europe, medium haul to the US and Canada with several regional Caribbean services.

Montserrat has one aerodrome which was opened and certificated in 2005 following the loss of the original aerodrome due to a volcanic eruption a few years before.

Montserrat aerodrome has one short non-instrument runway (553x18m), this was resurfaced, grooved and given enhanced touchdown markings in 2021. There are significant drops in the terrain at each end of the runway. It is daytime only operation. The aerodrome has a full Air Traffic Service that sits under uncontrolled airspace. A new tower is under construction and new RFFS vehicles are being commissioned in 2023. As a volcanic island there is significant high ground, and this can generate some turbulence around the aerodrome.

The combination of the short runway and prevailing turbulence means that there are special conditions placed on pilots operating at the aerodrome. A non-standard steep approach path based on flight tests delivers the aircraft to the correct point of touchdown minimising the turbulence effect. Due to the runway length the aerodrome is only used by small aircraft operating to neighbouring islands. Due this there are conditions on the use of this aerodrome.

There are two regular airlines operating into Montserrat using Islander aircraft a few times a day. One of the airlines is locally based and holds a Montserrat AOC (OTAR Part 135). It has a line maintenance station at the aerodrome with all other maintenance being conducted elsewhere. There are ad-hoc charters as well as occasional foreign tourist helicopter operations from neighbouring Antigua.

St. Helena

This once volcanic island is situated around 1200nm south of West Africa and 1000nm West of Namibia in the Atlantic Ocean. It has a population of around 4,500 people. The 2016 certificated aerodrome has been served once a week since 2017 from Johannesburg with an Embraer 190 aircraft. During Covid 19 a Boeing 757 flight from the UK operated. Both operations included Ascension 700nm away. There are occasional medivac flights and some general aviation visitors.

The concrete runway (1950x45m) is served by various instrument approaches (VOR/ DME, RNAV, RNP). It sits on a plateau at an elevation of 1,000ft. The local terrain and remote location create turbulence issues that are carefully monitored. Highest terrain point is 2684ft. The aerodrome provides comprehensive briefing material for Operators. It has a full Air Traffic Service serving the CTR and TMA. It sits under the Angolan (Luanda Oceanic) airspace.

There are no based operators or maintenance facilities available at the aerodrome.

Our aviation in numbers (snapshot end 2022)**Aerodromes****6****Aerodromes****1****Heliport****4****Aerodrome
operators****267,689****Passengers
handled****45,934****Movements
handled****124****Occurrences reported*****Aircraft Operators*****6****Aocs****1****125 operator****25****Aircraft****47,742****Passengers
carried****397,241****Cargo
carried (kgs)****9,443****Hours
flown****18,900****Sectors
flown**

Types operated:

Beechcraft 200 King Air**B**N Islanders/ Trislander**D**H6 Twin Otters/ DH7**C**essna 402s/ 414**R**obinson R44

*Includes Falkland Islands data

Appendix E Enforcement guide graphic

