



State Safety Programme for the CAYMAN ISLANDS

Issue 3.0

31 August 2021

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Record of Amendments

Issue	Date	Notes
V 0.1	31 December 2015	First draft
V 0.2	04 January 2016	Second draft
V 0.3	10 January 2016	Third draft – for consultation
V 1.0	22 February 2017	First Issue
V 2.0	28 February 2019	Review and update of gap analysis
V 3.0	31 August 2021	Review to include reformatting of the document, Air Accident 2019 regulations, identification of ALoSP and review update of the gap-analysis and work plan going forward.

Abbreviations and Definitions

Abbreviations

The following abbreviations and associated meanings apply throughout this document:

AAIB	Air Accidents Investigation Branch
ALoSP	Acceptable Level of Safety Performance
ANO	Air Navigation Order
AN(OT)O	Air Navigation (Overseas Territories) Order
ASSI	Air Safety Support International Limited
CAA	Civil Aviation Authority (UK)
CD	UK Crown Dependency
CHIRP	Confidential Human Factors Incident Reporting Programme
DGCA	Director-General of Civil Aviation
DfT	Department for Transport (UK)
Doc	Document
EASA	European Aviation Safety Agency
ECCAIRS	European Coordination Centre for Accident and Incident Reporting System
FCO	Foreign and Commonwealth Office (UK)
ICAO	International Civil Aviation Organisation
HF	Human Factors
HM	Her Majesty
IATA	International Air Transport Association
iaw	In Accordance With
IBIS	ICAO Bird Strike Information System
IT	Information Technology
iSTARS	Integrated Safety Trend Analysis and Reporting System
LoA	Letter of Agreement
MOR	Mandatory Occurrence Report
MoU	Memoranda of Understanding
OTs	Overseas Territories
OTAA	Overseas Territories Aviation Authorities
OTAC	Overseas Territories Aviation Circular
OTAR	Overseas Territories Aviation Requirement
OTSPC	Overseas Territories Safety Performance Council
PBR	Performance Based Regulation
POE	Pool of Experts

QMS	Quality Management System
SAFA	Safety Assessment of Foreign Aircraft
SAR	Search and Rescue
SARPs	ICAO Standards and Recommended Practices
SIRC	SSP Implementation and Review Committee
SMS	Safety Management System
SPI	Safety Performance Indicator
SPT	Safety Performance Target
SSP	State's Safety Programme
UK	United Kingdom
UKBSC	UK Birdstrike Committee
USOAP	ICAO Universal Safety Oversight Audit Programme

Definitions:

The following definitions apply to the identified terms used in this document:

Acceptable Level of Safety Performance (ALoSP)

The level of safety performance agreed by State authorities to be achieved for the civil aviation system in a State, as defined in its State safety programme, expressed in terms of safety performance targets and safety performance indicators. (ICAO Doc 9859)

Cayman Islands Aviation Industry

A term used to identify the totality of the Cayman Islands Aviation Industry including its airports system, its aircraft register and associated supporting organisations which hold an approval issued by the Authority.

Concept of Safety

Safety is the state in which the possibility of harm to persons or property damage is reduced to, and maintained at or below, an acceptable level through a continuing process of hazard identification and risk management. (ICAO Doc 9859)

Safety Management System

A systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies and procedures. (ICAO Doc 9859)

Safety Objective

A brief, high-level statement of safety achievement or desired outcome to be accomplished by the State safety programme or service provider's safety management system.

Note.— Safety objectives are developed from the organization’s top safety risks and should be taken into consideration during subsequent development of safety performance indicators and targets. (ICAO Doc 9859)

Safety Performance Indicators

A Safety Performance Indicator (SPI) is defined by ICAO as a measure (or metric) used to express the level of safety performance achieved in a system. (ICAO Doc 9859)

SPIs are used to assess operational safety performance through monitoring. They are generally expressed in terms of the frequency of occurrences of some event causing harm, e.g., the number of fatal aircraft accidents per year or serious incidents per 10,000 flight hours. A set of indicators should also include leading indicators. These indicators do not require a safety event to take place and are metrics that provide information on the current situation that may affect future performance.

The ICAO Safety Management Manual further states that there is no single SPI indicator that is appropriate in all circumstances. The indicator must be chosen so that it matches the application in which it will be used for a meaningful evaluation. SPIs chosen to express global, regional and national targets will, in general, not be appropriate to individual organisations.

Safety Performance Target.

The State or service provider’s planned or intended target for a safety performance indicator over a given period that aligns with the safety objectives. (ICAO Doc 9859)

Service Provider

The term is used to refer to an aviation industry organization implementing SMS whether on a mandatory or voluntary basis, unlike Annex 19 which uses the term to refer to a very specific list of organizations found in Chapter 3, which excludes international general aviation operators. (ICAO Doc 9859)

State Safety Programme

State Safety Programme is an integrated set of regulations and activities aimed at improving safety. It is a management system for the administration of safety by the State. (ICAO Doc 9859)

A platform for the State to apply the two basic safety management principles throughout its civil aviation organizations – Safety Risk Management (SRM) – Safety Assurance (SA); a framework that allows the State safety oversight authority and service providers to interact more effectively in the resolution of safety concerns

CONTENT		PAGE
Record of Amendment		3
Abbreviations and Definitions		4
Table of Contents		7
Foreward		10
Overview		11
Chapter 1	United Kingdom Overseas Territories Aviation Legislative Structure	12
1.1	Introduction	12
1.2	United Kingdom Overseas Territories	12
1.3	Primary Elements of the Aviation Legislative and Regulatory Structure in the Overseas Territories	13
1.3.1	The Privy Council	14
1.3.2	Orders in Council	14
1.3.3	The Air Navigation (Overseas Territories) Order	14
1.3.4	The UK Department for Transport (DfT)	14
1.3.5	Air Safety Support International (ASSI)	15
Chapter 2	United Kingdom Overseas Territories Aviation Regulatory Structure	16
2.1	State Safety Legislative Framework	16
2.2	Primary Legislation - Civil Aviation Act 1949 (Overseas Territories) Order 1969	17
2.3	Subsidiary Legislation - Air Navigation (Overseas Territories) Order AN(OT)O	18
2.4	Operating Regulations/Requirements - Overseas Territories Aviation Requirements (OTARs)	18
2.5	Industry Guidance Material - Overseas Territories Aviation Circulars (OTACs)	19
Chapter 3	Regulatory Authority and Responsibilities	20
3.1	UK OT Civil Aviation Framework and Accountabilities	20
3.2	The UK Department for Transport Responsibilities	21
3.3	The UK OT's Governor's Responsibilities	21
3.4	The UK Civil Aviation Authority Responsibilities	21
3.5	Air Safety Support International Responsibilities	21
3.5.1	Review of Regulations	22
3.6	The Civil Aviation Authority of the Cayman Islands Responsibilities	22

CONTENT		PAGE
Chapter 4 Cayman Islands State Safety Programme		23
4.1	State Safety Programme Documentation and Records	23
4.2	Development of the Cayman Islands State Safety Programme	23
4.3	State Safety Programme Responsibilities and Resources	23
4.4	State Safety Programme Coordination Committee	23
4.5	State Safety Policy	24
4.6	State Acceptable Level of Safety	24
4.6.1	Cayman Islands State Acceptable Level of Safety	24
4.7	Achieving the Acceptable Level of Safety Performance	24
4.7.1	Cayman Islands State Safety Objectives	25
4.7.2	Achieving State Safety Objectives	25
4.7.3	Requirement for a Safety Management System	25
4.8	State Safety Programme Improvement/Review	26
4.9	State Accident and Incident Investigation	26
4.10	State Enforcement Policy	26
Chapter 5 Cayman Islands Safety Risk Management		28
5.1	Safety Requirements for the Service Provider SMS	28
5.2	Overseas Territories Aviation Requirements for an SMS	28
5.3	Agreement of the Service Provider's Safety Performance	29
5.4	Periodic Assessment of the Service providers SMS	29
Chapter 6 Cayman Islands State Safety Assurance		30
6.1	Certification Approval and Licensing System	30
6.2	Safety Oversight of Service Providers	31
6.2.1	Audit and Inspection	31
6.2.2	Additional Inspectoral Resources	31
6.2.3	Ramp Checks	31
6.2.4	Regulatory Non- Compliance	31
6.2.5	Enforcement	32
6.3	Internal SSP Review/Quality Assurance	32
6.3.1	Quality management	32
6.3.2	Performance Indicators	32
6.4	External SSP Review/Audit	33
6.5	Safety Data Collection Analysis and Exchange	33
6.5.1	Cayman islands Mandatory Occurrence Reporting	33
6.5.2	Bird Strike Reporting	34
6.6	Voluntary/Confidential Reporting System	34
6.6.1	Confidential Human-Factors Incident Reporting Programme	34
6.7	Safety Data-Driven Targeting of Oversight Areas of Greater Concern or Need	35

CONTENT		PAGE
Chapter 7	Cayman Islands State Safety Promotion	36
7.1	Internal Training Communication and Dissemination of Safety Information	36
7.1.1	Internal SSP SMS and Safety Training	36
7.1.2	Internal Communication and Dissemination of Safety Information	36
7.2	External Training Communication and Dissemination of Safety Information	36
7.2.1	External SMS and SSP Training/Education Facilitation	36
7.2.2	External Communication & Dissemination of Safety Information	36
Chapter 8	Summary	38
Appendices		39
Appendix A	Cayman Islands Safety Policy	40
Appendix B	Overseas Territories Enforcement Policy	41
Appendix C	ICAO Doc 9859 Edition 3 SP Gap Analysis Conducted November 2013 – Updated January 2021	44
Appendix D	Cayman Islands SSP Workplan 2021-2023	56
Appendix E	Cayman Islands Civil Aviation Authority - Designations	58
Appendix F	Description of the Cayman Islands Aviation Industry	59
Appendix G	ICAO Critical Elements	62

Foreword

Annex 19 to the Chicago Convention (effective November 2013) 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) and the UK has established legislation dealing with 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 (as amended) has been published and 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 his responsibilities through the Director-General of Civil Aviation designated for implementation of all Annexes with the exception of Annex 9 – *Facilitation*, Annex 13 – *Aircraft Accident and Incident Investigation* and Annex 17 - *Security*.

The nature of the civil aviation across the UK OTs varies in the type and scale of operations. Due to the geographical differences, 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 so have not adopted European Aviation Safety Agency (EASA) regulations. Therefore, although part of the overall UK SSP, it is more practicable for each Territory to devise an SSP to address the safety needs of their civil aviation sector. This document describes the State¹ Safety Programme (SSP) for Cayman Islands to enable the implementation of Annex 19 SARPs within the UK's State Safety Programme.

The Civil Aviation Authority of the Cayman Islands is intent on evolving and building its SSP to fully meet the requirement of Annex 19 and it will provide the necessary resources to support this activity.

The co-operation and involvement of the industry which it regulates is crucial to the development of an effective SSP and I would welcome any comments on this document which should be sent, for my attention, to civil.aviation@caacayman.com



Richard Smith
Director-General
Civil Aviation

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 the Cayman Islands is responsible for developing its own Safety Programme as part of the UKSSP.

State Safety Programme Overview

The following paragraphs encapsulate the essence of a State Safety Programme (SSP).

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 level of the ALoSP and the means by which it is expressed remains at the discretion of the State. Safety Performance Indicators/Targets are currently evolving alongside service providers’ Safety Management Systems (SMS).
2. The requirement for an SSP recognises that States, as well as service providers, have safety responsibilities and it provides a framework within which service providers are required to establish SMSs. The framework comprises four components:
3. Currently, ICAO standards for an SSP are contained in Annex 19 (2nd Edition - 2016) which became applicable on 14th November 2013. Supporting information is contained in Doc 9859 (4th Edition - 2018) which identifies the component parts of an SSP as:

SSP component 1	State safety policy, objectives and resource;
SSP component 2	State safety risk management;
SSP component 3	State safety assurance;
SSP component 4	State safety promotion.
4. ICAO Standards also require that the Acceptable Level of Safety Performance (ALoSP) to be achieved is established by the State(s) concerned. The concept of establishing an ALoSP attempts to complement the current regulatory compliance approach to safety management with a performance based approach. Some guidance on what constitutes an ALoSP is provided by ICAO. In summary, the ALoSP consists of 4 components, a start point, safety performance indicator (SPI), an in-year safety performance target (SPT) and the safety requirements to achieve the target.
5. The Cayman Islands SSP has been developed using the material within ICAO Document 9859 i.e. the SSP framework and guidance material, including the SSP gap analysis. Where appropriate, the headings proposed by ICAO in its framework SSP document have been adopted in this document.
6. Following the ICAO framework SSP document structure, Chapter 1 and Chapter 2 describe the State high level overview looking at the underpinning of the legal and regulatory structures. Chapter 3 reviews regulatory authority and the associated responsibilities with Chapters 4-7 detailing the Cayman Islands State Safety Programme.

CHAPTER 1 UNITED KINGDOM OVERSEAS TERRITORIES AVIATION LEGISLATIVE STRUCTURE

1.1 Introduction

Overseas Territories (OTs) of the UK are not ICAO Contracting States in their own right. The use of the term “State” in this paper reflects that the Cayman Islands is responsible for developing its own Safety programme as part of the UKSSP.

References to OTs within this document relate specifically only to Bermuda, Cayman Islands, Falkland Islands and the Turks and Caicos Islands whose Director-Generals of Civil Aviation have been designated by the respective Governors with responsibilities for aviation safety oversight.

This chapter sets out the legislative structure which applies to the UK OTs whether they are designated by the Governor or whether the designations are assigned to Air Safety Support International responsible for oversight of the UK’s overseas interests.

1.2. The United Kingdom Overseas Territories

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 Overseas Territories (OT) and the Crown Dependencies (CD).

Currently, there are fourteen UK territories, which are constitutionally separate from the UK. All have separate constitutions made by a UK Order in Council. However, the UK remains responsible for discharging its obligations under the Chicago Convention in respect of all civil aviation activities in the OTs. As alluded to above, some of the OTs have been designated by the Governor with the responsibility for safety oversight, monitored by the UK, whilst in others the function is carried out by ASSI on behalf of the Governor. In either circumstance, the structure and the application of the legislative and regulatory process remains the same and is identified in Figure 1 on the following page.

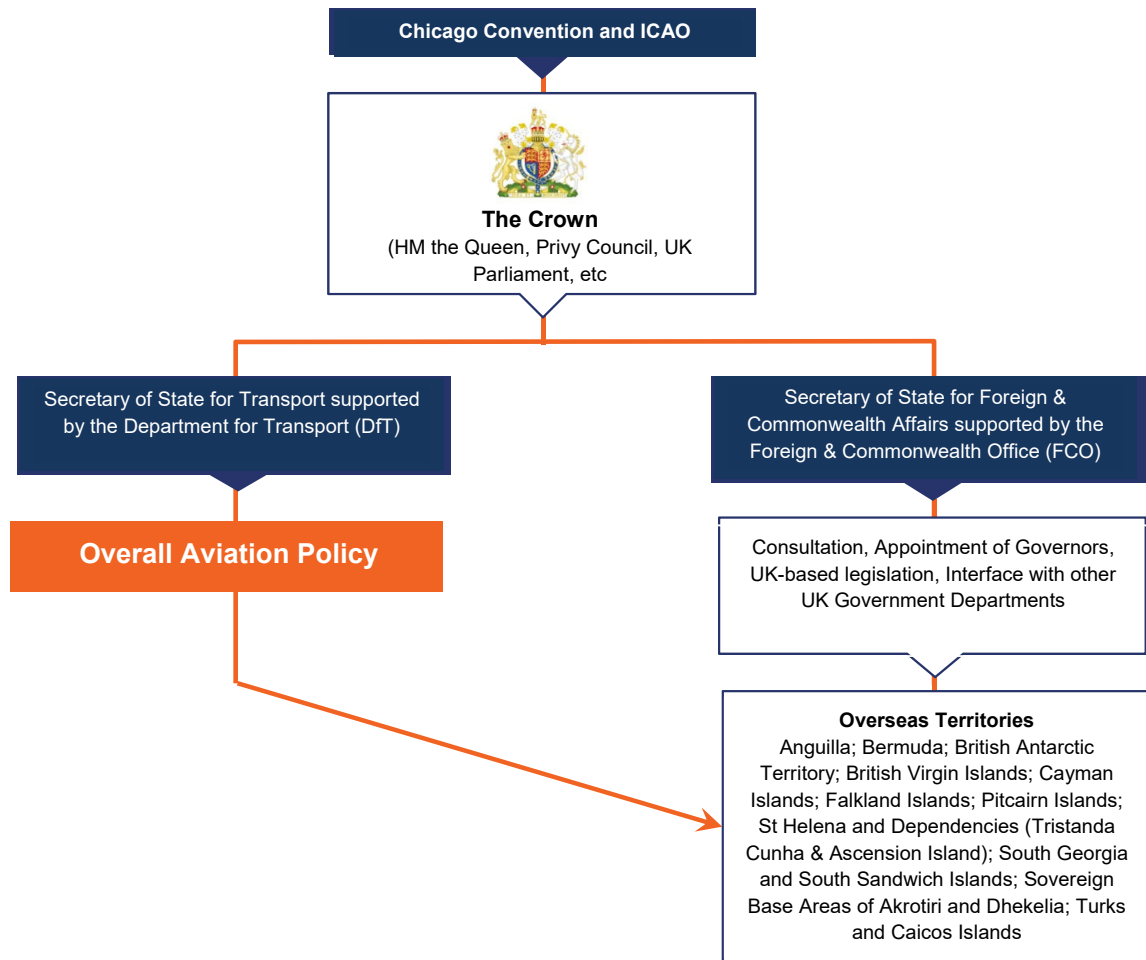


Figure 1 - The UK as a Contracting State to ICAO (simplified constitutional relationship between ICAO, the UK and its OTs – note that not all have aviation activity).

1.3 Primary Elements of the Aviation Legislative and Regulatory Structure in the Overseas Territories

The UK discharges its responsibility under the Chicago Convention in respect of civil aviation in the OTs by developing and implementing a specific legislative and regulatory structure enacted and enabled through the following:

- a) The Privy Council;
- b) Orders in Council;
- c) Air Navigation (Overseas Territories) Order
- d) The UK Department for Transport;
- e) Air Safety Support International;

The functions of the above are as follows:

1.3.1 The Privy Council,

The Privy Council 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 the Queen on Orders in Council, granting Royal Charters and, through its Judicial Committee, acting as the final court of appeal from courts in the OT. The British Cabinet remains formally a committee of the Privy Council.

1.3.2 Orders in Council

Orders in Council are approved by the Queen 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.

Parts of the 1949 and elements of the 1971 and 1982 Civil Aviation Acts have been extended to the OTs by Orders in Council. The 1949 Act provides for a State to make an Air Navigation Order (ANO) to implement the Annexes to the Chicago Convention and to regulate air navigation generally.

1.3.3 Air Navigation (Overseas Territories) Order

The Air Navigation (Overseas Territories) Order (AN(OT)O) gives the Governor of each OT powers and responsibilities in respect of aviation safety oversight. However, it requires the Governor to designate the majority of his powers to a person; in practice this is either a local Director of Civil Aviation (DCA) who is usually an employee of the OT's Government, or to Air Safety Support International (ASSI), a wholly owned subsidiary of the UK CAA. The Governor is required to consult ASSI before making (or revoking) any such designation.

1.3.4 The UK Department for Transport

The UK Department for Transport (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 Foreign and Commonwealth Office (FCO) for the UK OTs. The DfT is responsible for the UK CAA and also for its wholly owned subsidiary company Air Safety Support International Ltd (ASSI).

1.3.5 Air Safety Support International (ASSI)

In the Civil Aviation Authority (Overseas Territories) Directions 2003, the Secretary of State directed the CAA to establish ASSI as a subsidiary 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. These Directions extended ASSI's responsibilities to include aviation security oversight and regulation but exclude Annex 9, Facilitation, 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.

ASSI is responsible for providing assistance, training and advice to the OTs' aviation authorities. In addition, ASSI conducts routine assessment visits to the OT where a person has been designated by the Governor other than ASSI itself. These assessments provide assurance to the Governor that his designations are being discharged effectively.

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 policy-maker, advisor/mentor and, depending upon the status of delegation in each Territory, assessor of the safety oversight programme.

CHAPTER 2 UNITED KINGDOM OVERSEAS TERRITORIES AVIATION REGULATORY STRUCTURE

2.1 State Safety Legislative Framework

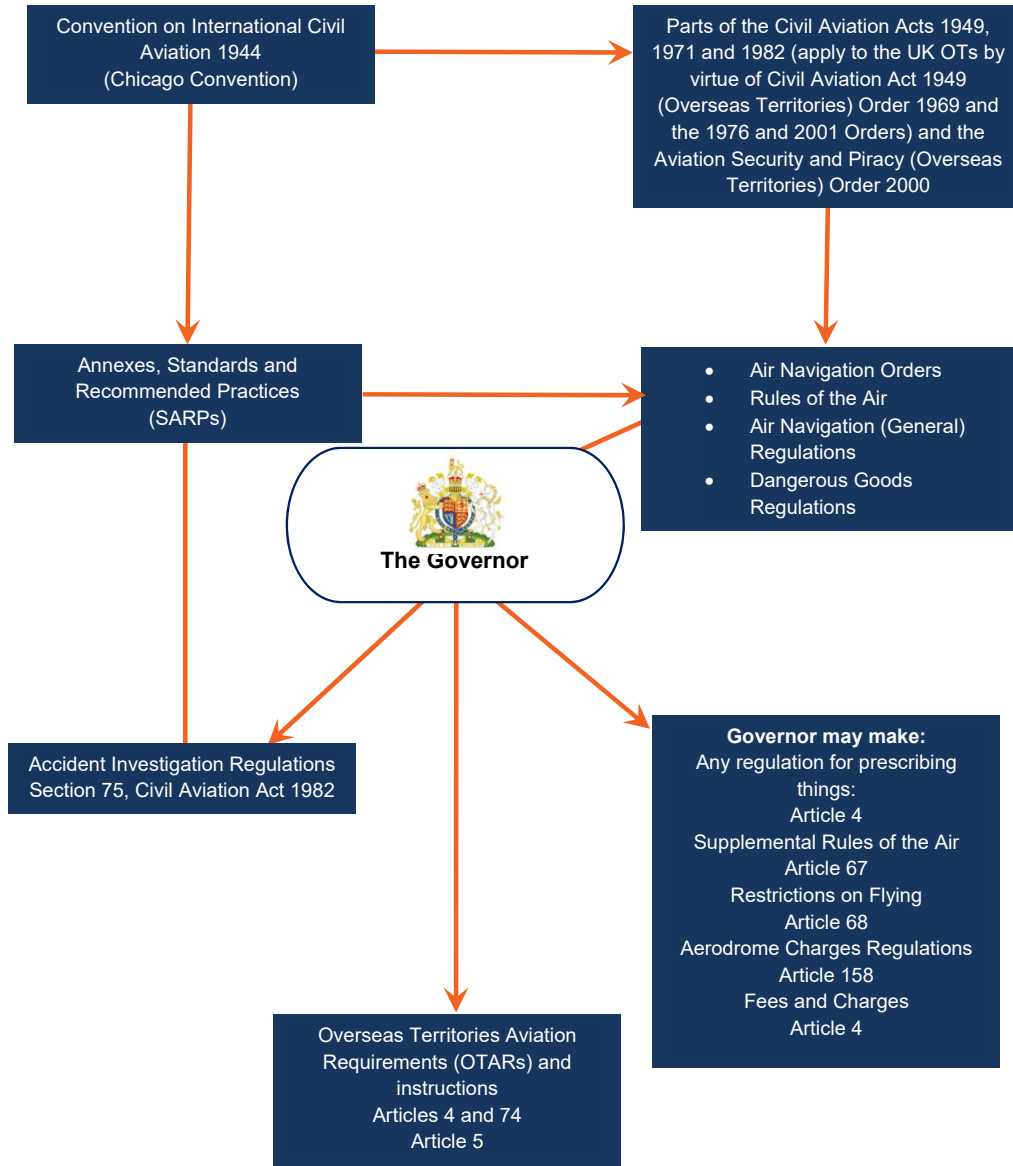


Figure 2 - UK Overseas Territories regulatory framework, note article refers to the provisions of the AN(OT)O 2013.

2.2 Primary Legislation - Civil Aviation Act 1949 (Overseas Territories) Order 1969

The Civil Aviation Act 1949, as extended to the Overseas Territories by the Civil Aviation Act 1949 (Overseas Territories) Order 1969 is the primary legislation that requires 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 Overseas Territories.

This Act has been supplemented by the extension of section 62 of the Civil Aviation Act 1971 to the OTs:

- a) by the Civil Aviation Act 1971 (Overseas Territories) Order 1976 - section 62 increased the penalties for breaches of an Air Navigation (Overseas Territories) Order) and 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 and No.2 Order 2001.
- b) Section 61 increased the penalties for breach of an AN(OT)O.
- c) Section 75 enables the Governors to make air accident and investigation regulations.
- d) 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).

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 Overseas Territories by the Aviation Security and Piracy (Overseas Territories) Order 2000.

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 1971 and 1982 Civil Aviation Acts have also been extended to the Overseas Territories (see below).

2.3 Subsidiary Legislation – Air Navigation (Overseas Territories) Order 2013

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.

The latest revision is a complete re-write, simplifying and modernising 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 rebalanced and consolidated version, 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. Four amendments have been made to date to the AN(OT)O 2013 (the 2014 (2), 2015 and the 2021 amendment Orders).

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.

2.4 Operating Regulation/Requirements – Overseas Territories Aviation Requirements (OTARs)

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.

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.

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

- a) the requirements for obtaining and holding a licence, certificate, authority or approval;
- b) the way in which the rights and privileges of licences, certificates, authorities or approvals are exercised;
- c) the way obligations which come with the privileges are to be discharged; and

- d) general instructions regarding the operation and equipment of aircraft.

2.5 Industry Guidance Material – Overseas Territories Aviation Circulars (OTACs)

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

OTACs provide the following information:

- a) practical, detailed guidance on meeting the requirements;
- b) information of a temporary nature;
- c) administrative material;
- d) information published in advance of a formal amendment to OTARs;
- e) 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.

CHAPTER 3 REGULATORY AUTHORITY AND RESPONSIBILITIES

3.1 UK OT Civil Aviation Framework and Accountabilities

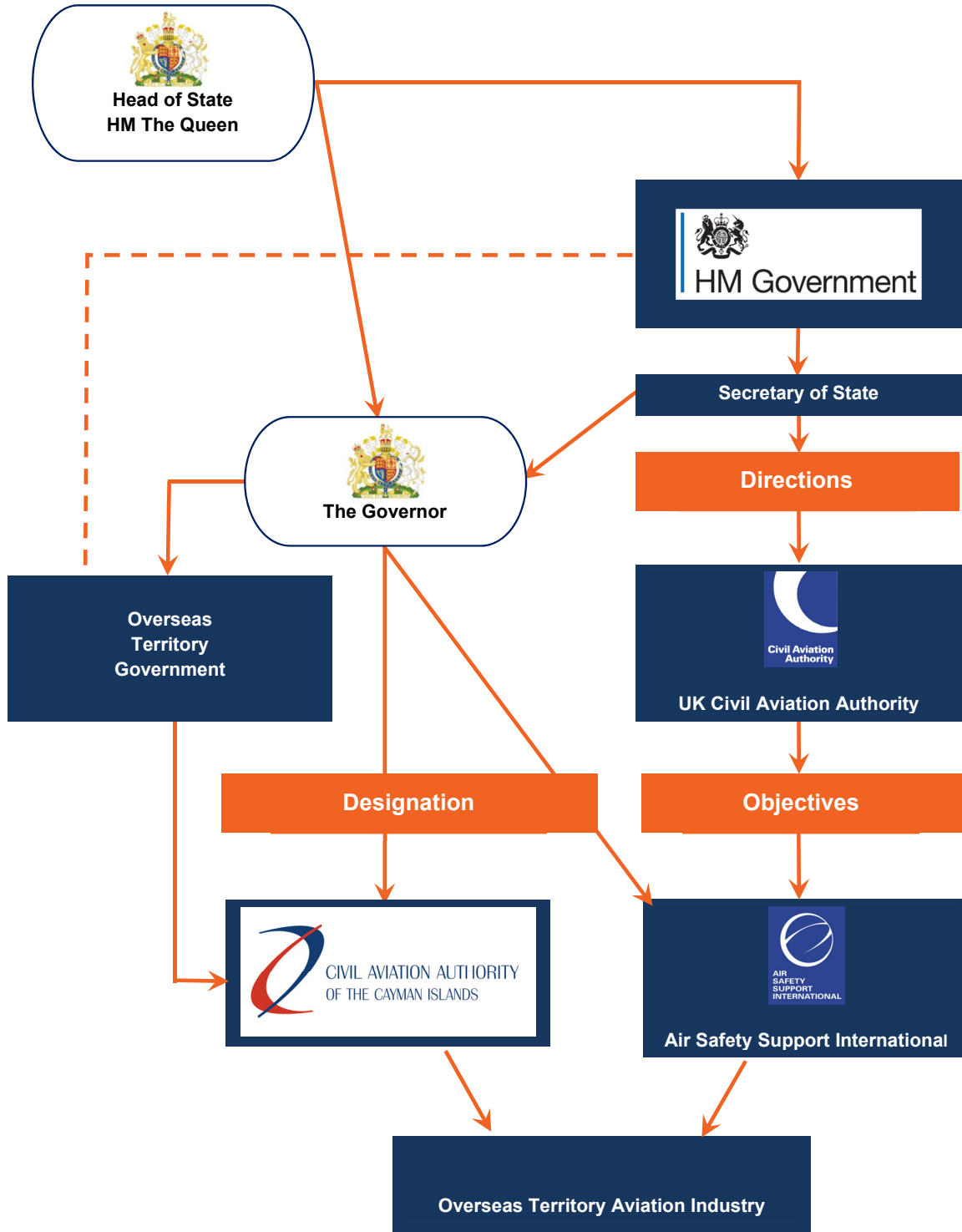


Figure 3 – UK Overseas Territories flow of authority

3.2 The UK Department for Transport Responsibilities

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 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.

3.3 The UK OT's Governor's Responsibilities

The Governor is the Queen'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 international affairs which are reserved to the UK under the Constitution. Governors are accountable to the Foreign and Commonwealth Office (FCO).

As the Queen'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.

3.4 The UK Civil Aviation Authority Responsibilities

The UK CAA appoints the Board of ASSI, a wholly owned UK CAA subsidiary, along with enacting the Directions to establish ASSI and setting objectives for ASS subject to the Secretary of State's approval. The 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.

3.5 Air Safety Support International Responsibilities

ASSI is responsible for the drafting of the AN(OT)O, OTARs and OTACs in order to implement the 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 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. This includes advice and recommendations to the Governor on the designation of a regulator in the Territory.

ASSI is the designated regulator responsible for Annex 17 (Aviation Security) within all the UK OTs.

3.5.1 Review of Regulations

Regulations are regularly reviewed by ASSI. Such reviews may be triggered through:

- a) Monitoring ICAO State Letters and notification to the OTs;
- b) Safety issue feedback from the OTAAs via the Overseas Territories Safety Performance Council (OTSPC);
- c) DCA conference call feedback;
- d) ASSI/OTAA Inspector webinar;
- e) ASSI/OTAA training events;
- f) Direct feedback from ASSI staff;
- g) Direct feedback from OTAA staff;
- h) Direct feedback from service providers.

3.6 Civil Aviation Authority of the Cayman Islands (CAACI) responsibilities/designations

The CAACI is the designated regulator responsible for the majority of the functions identified in the AN(OT)O other than those reserved to the DfT (Annex 9), HE The Governor (Annex 13) and to ASSI (Annex 17). The table in Appendix F illustrates organisational structure and the ICAO Annex responsibilities of each body.

As such, and in order to enhance its oversight and to meet the ICAO requirement, the CAACI will adopt the roles and responsibilities as the "State" in order to develop and implement the Cayman Islands State Safety Programme. This SSP, covering the Cayman Islands aviation industry, will form part of the UK's State Safety Programme.

In addition, in support of its oversight activities, the CAACI produces, where required, its own policies, procedures and guidance material to meet the particular operational requirements of its aviation industry. In doing so, it ensures that these documents are compliant with international and national aviation and regulation.

CHAPTER 4 CAYMAN ISLANDS STATE SAFETY PROGRAMME

4.1 State Safety Programme Documentation and Records

This SSP document will be subject to regular review. The background and method used to create the SSP implementation plans are outlined in the OT SSP Part 2. The OT SSP Part 3 is a live document that details each UK OT State Safety Plan. It is regularly updated and review by the OTSPC.

4.2 Development of the Cayman Islands State Safety Programme

The Overseas Territories Safety Performance Council, which comprises UK OT Directors of Civil Aviation, ASSI and UK OT representatives, conducted a gap-analysis based on the requirements of ICAO Document 9859 Safety Management Manual in November 2013. This activity was coordinated by ASSI with each OT being responsible for conducting its own, individual gap analysis. The Cayman Islands Cayman Islands document can be found at Appendix C to this document.

The information from the gap analysis led each OT to develop a SSP implementation plan to address the identified shortfalls. Noting the size and resource of each OTAA, the initial focus of the work is to create and evolve the missing elements identified by the gap analysis. As these elements are completed the focus will move from implementation to continuous improvement.

4.3 State Safety Programme Responsibilities and Resources

The prime responsibility for the UK SSP rests with the DfT. However, each OT is responsible for providing its own, specific SSP for inclusion into the overall UK SSP unless ASSI has been designated to perform the safety oversight function by an OT Governor. It therefore follows that the Cayman Islands is responsible for producing its own SSP and the Director-General of Civil Aviation (DGCA) is the Accountable Manager for this activity. The DGCA is responsible for providing the necessary resources to enable the SSP to be developed and sustained to meet the requirements of ICAO and the UK. In the Cayman Islands, the Director of Air Navigation Services (DANSR) is responsible for the development and management of the SSP.

4.4 State Safety Programme Coordination Committee

This function is conducted as part of the CAACI's quarterly SSP Implementation and Review Committee (SIRC) meeting.

4.5 State Safety Policy

The Cayman Islands Safety Policy is regularly reviewed. It is available on the CAACI Web Site and is contained at Appendix A to this document.

4.6 State Acceptable Level of Safety

ICAO requires States to establish a safety programme in order to achieve an Acceptable Level of Safety Performance (ALoSP). An ALoSP is defined as the level of safety that a State strives to achieve throughout its aviation system.

4.6.1 Cayman Islands Acceptable Level of Safety Performance

The Cayman Islands aviation system includes a significant register of aircraft operating globally under OTAR Parts 121, 125, and 135, collectively identified, for the purposes of this document only, as commercial air transport.

The intent of the Cayman Islands ALoSP is to set and achieve safety standards which will engender the trust and confidence of those who provide or who have use of any part of its civil aviation system.

The Cayman Islands, in keeping with its status as a British Overseas Territory, has adopted a similar ALoSP to that of the UK and has developed an SSP that is designed to support and achieve it.

In common with the United Kingdom, the Cayman Islands has adopted an ALoSP that seeks to achieve:

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.

4.7 Achieving the Acceptable Level of Safety Performance

The Cayman Islands seeks to achieve this ALoSP through State Safety Objectives that:

- a) protect people from aviation safety risks.
- b) have a positive influence on aviation safety through collaborative working
- c) with our national and international partners.

4.7.1 Cayman Islands State Safety Objectives

To achieve the key targets identified within its ALoSP, the Cayman Islands has adopted the following primary State Safety Objectives:

- a) No fatal accidents in commercial air transport Aeroplanes where the Cayman Islands has State oversight responsibility;
- b) No fatal accidents in commercial air transport Rotorcraft where the Cayman Islands has State oversight responsibility;
- c) No fatal accidents involving people on the ground in the Cayman Islands as a result of an aviation accident;
- d) Implement an effective State Safety Programme that delivers its Acceptable Level of Safety Performance.

4.7.2 Achieving the State Safety Objectives

The CAACI, as the regulatory authority of the Cayman Islands is responsible for assuring the safety performance of its aviation system. It achieves this assurance by providing its aviation system with a regulatory code, advice, guidance, safety information and oversight, the latter being achieved through audit, inspection and review processes. Central to the oversight activity is compliance with the regulations and the effectiveness of the individual service provider's Safety Management System (SMS).

4.7.3 Requirement for a Safety Management System

In line with ICAO Annex 19, the CAACI requires all Aircraft Operators, Aircraft maintenance Organisations (AMOs), Continued Aircraft Maintenance Organisations (CAMOs) Aerodrome Operators and Air Navigation Service Providers (ANSPs), to establish an SMS commensurate with the size and complexity of the organisation.

An effective SMS will give service providers a systematic approach to the management of safety through the application of resource to risk. It is designed to improve safety performance through:

- a) Continuous improvement;
- b) Understanding its individual Acceptable Level of Risk through processes of:
 - i) hazard identification;
 - ii) assessment of safety risks;
 - iii) mitigation of risk;
 - iv) collection, analysis and sharing of safety data and safety information.

The SMS should proactively mitigate safety risks before they result in an aviation accident or incident. Properly applied, it allows service providers to effectively manage their activities, safety performance and resources through the adoption of safety focussed day-to-day activities.

4.8 State Safety Programme Improvement/Review

The OTSPC will review the progress of each OTAA's implementation plans at each meeting. As the implementation plans progress, a revised SSP gap analysis will be conducted at regular intervals.

4.9 State Accident and Incident Investigation

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.

The current regulations, Civil Aviation (Investigation of Air Accidents and Incidents) Regulations 2019), empower the Governor to appoint the Chief Inspector of the UK Air Accident Investigation Branch (UKAAIB) AAIB to undertake the investigation of any accident or incident, within the Territory or involving a Cayman registered aircraft abroad.

Under the Regulations, 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.

At the discretion of the Chief Inspector, a local and qualified individual may be appointed to assist the AAIB in the conduct of its investigation.

4.10 State Enforcement Policy

Following the OTSPC gap analysis exercise, it was agreed by the OTAA DCAs and ASSI that a common enforcement policy would be adopted by all OTAAs. The policy is based on ICAO 9859 Safety Management Manual guidance. A copy of this policy is contained in appendix B.

The enforcement procedure that accompanies the policy recognises that enforcement covers a range of activities from usual everyday oversight, to powers that enable the prevention of flight, suspension, variation or revocation of a licence or certificate, offer of a right of review and finally prosecution. The procedure provides a consistent approach that takes into account the performance of the service provider's Safety Management System,

voluntary reporting and the specific circumstances of each event. It is based on the overall aim of achieving compliance and safe operation.

Should it be required, a case that escalates to prosecution 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. If requested, ASSI may be able to provide both legal advice and access to specialist investigation officers to assist with the mounting of an investigation. 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.

CHAPTER 5 CAYMAN ISLANDS SAFETY RISK MANAGEMENT

In managing Risk, the UK Overseas territories, including the Cayman Islands, require service providers to develop and implement a Safety Management System (SMS) which enables the identification and therefore the management of Risk. In this context, the term “service provide” applies equally to the provider of a product.

5.1 Safety Requirements for the Service Provider Safety Management System

Annex 19 identifies 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, may be integrated into existing systems such as quality management or security management systems which may already be employed by service providers. The approach to achieving a fully effective SMS will be to develop elements over time and, where appropriate, to integrate them into other established systems.

Regulatory oversight will review these elements with the initial focus being on hazard logs, safety meetings and reporting procedures.

5.2 Overseas Territories Aviation Requirements for a Safety Management System

OTARs are Gazetted in the Cayman Islands and are therefore part of the jurisdiction’s legal code. The following OTARs require an SMS to be established appropriate to the size and Complexity of the specified operation:

OTAR 61	Pilot licences and ratings (Training organisation)
OTAR 65	Air traffic services personnel licences ratings and training organisation approval
OTAR 66	Aircraft maintenance personnel licensing (Training organisation)
OTAR 119	Air operator’s certificate
OTAR 125	Complex GA (including corporate operations)
OTAR 139	Certification of aerodromes
OTAR 140	Rescue and fire-fighting requirements
OTAR 145	Aircraft maintenance organisation approval
OTAR 171	Aeronautical telecommunication service
OTAR 172	Air traffic service organisation approval
OTAR 173	Flight Checking Organisation Approval
OTAR 176	Instrument flight procedure approval

Associated with each OTAR are Overseas Territories Aviation Circulars (OTACs) which provide guidance on developing an SMS including information on Safety Assessments (Aeronautical Studies, Safety Cases, Risk Assessments). Although OTACs are guidance material and not mandatory, they do provide very useful information which, if followed would be beneficial to the process.

As the author of the OTARs, ASSI has set an objective to review and update regulations in line with developments in International legislation and regulation. In addition, the Company regularly reviews and updates its related guidance material, issuing new and updated information when required. It also provides and facilitates training for both regulatory and service provider staff to improve safety management.

5.3 Agreement of Product or Service Provider's Safety Performance

The CAACI is evolving a system to collate and evaluate data derived from the organisations that are subject to its regulatory oversight. Although still in development it is anticipated that this will include pre and post audit oversight meetings across multi disciplines.

It is anticipated that the Director of Air Navigation Services (DANSR), responsible for the development and management of the SSP, Departmental Heads and specialist managers will participate in these meetings to discuss and share information and data relevant to the service provider and its operating environment.

The CAACI has not yet to establish acceptable levels of safety for service providers. However, during oversight visits, CAACI inspectors conduct regular reviews of service provider's risk registers/hazard logs and the actions that they contain. These are monitored both for progress towards resolution and for additional items that might suggest that the individual system is actively identifying new Risk.

5.4 Periodic Assessment of the Product or Service Provider's SMS

As part of its audit process, the CAACI has commenced auditing the SMS, QMS and Human Factors (HF) elements of its service providers to establish a baseline for the assessment of the progress being made towards implementing SMS and by extension, the progress being made towards a fully implemented and effective State Safety Programme.

As new elements are introduced, the Authority will establish assessment criteria for inclusion in future oversight activities.

CHAPTER 6 CAYMAN ISLANDS STATE SAFETY ASSURANCE

State Safety assurance is achieved by the requirements, identified in the AN(OT)O for aviation activities to be Approved, Certificated, Licenced or Permitted in accordance with the regulations previously identified in Chapter 2 of this document. Once the CAACI has issued an Approval, Certificate, Licence or Permit the holder becomes subject to the CAACI oversight process designed to assess compliance with the associated terms and conditions.

6.1 Certification Approval and Licensing System

There are a number of processes employed to issue certificates, approvals, permissions and licences. These are either issued by the CAACI or validated by the Authority 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.

The following regulations, employed by the CAACI, cover certification approval and licensing:

OTAR 21	Certification of Aircraft
OTAR 36	Aircraft Environmental Standards
OTAR 39	Continued Airworthiness Requirements
OTAR 47	Aircraft Registration and Marking
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 Certificate
OTAR 121	Commercial Air Transport Operations – Large Aeroplanes
OTAR 135	Commercial Air Transport Operations – Helicopters and Small Aeroplanes
OTAR 139	Certification of Aerodromes
OTAR 140	Rescue and Fire Fighting Services (linked to aerodrome certificate)
OTAR 145	Aircraft Maintenance Organisation Approval
OTAR 171	Aeronautical Telecommunication Services
OTAR 172	Air Traffic Service Organisation Requirements
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 (linked to aerodrome certificate or AOC).

As previously identified, Overseas Territories Aviation Circulars (OTACs) are issued to provide advice, guidance and information on standards, practices and procedures to support the OTARS. OTACs are not in themselves law, however, they do amplify the requirements of the OTARS and offer practical guidance on meeting a requirement. They may also contain administrative material, information of a temporary nature or information published in advance of a formal amendment to OTARS.

6.2 Safety Oversight of Service Providers

Oversight is achieved through the audit and inspection process.

6.2.1 Audit and Inspection

Regulatory oversight is conducted through an audit and Inspection process based on the use of checklist and programmes of oversight to ensure that industry can demonstrate meeting the appropriate standards. Records of all such activities are maintained for reference in programming Performance Based Regulatory Oversight. Inspectors are specialists in the functional area which they regulate and regulatory competencies are defined for each role within the CAACI. In addition, advice and guidance is offered to service providers to assist them in achieving and maintaining compliance where necessary.

6.2.2 Additional Inspectoral Resources

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 and 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.

6.2.3 Ramp Checks

Ramp checks of foreign aircraft, based upon the Safety Assessment of Foreign Aircraft (SAFA) process, established by the European Civil Aviation Conference (ECAC), are conducted by airworthiness and flight operations. However, the results are not fed into the SAFA data base. In some Territories, the Governor has delegated limited functions to local officials to enable ramp checking of documentation carried on board by foreign operators.

6.2.4 Regulatory Non-Compliances

Any regulatory shortcomings, whether identified through audit process or otherwise, are generally dealt with by the low end of the enforcement procedure by the issuance of audit or inspection Findings. To facilitate advice, best practice and guidance, an audit may include Observations where something may have the potential to develop into a non-compliance or issue.

6.2.5 Enforcement

As identified previously, the CAACI has adopted the ASSI Enforcement Policy and Procedure which it would apply as necessary. The Enforcement process provides a structured escalation of measures designed to bring a non-compliant organisation or individual into a state of compliance. The Enforcement process allows for:

- a) prevention of flight;
- b) formal meetings;
- c) warning letters;
- d) 'on notice' status;
- e) suspension or revocation of any approvals, certificates or licences; and,
- f) prosecution.

However, prosecution will only be considered in extreme circumstances and is very much a measure of last resort.

A detailed explanation of the Enforcement Policy can be found at Appendix B to this document.

6.3 Internal SSP Review and Quality assurance

Whilst the focus is currently on developing the SSP based on Annex 19 and the ICAO Doc 9859, Safety Management Manual, the gap analysis conducted to create the implementation plan will be the basis for the CAACI's initial focus and will be periodically reviewed. This analysis, based on work conducted at the OTSPC, is shared with other members of the OTSPC. The aims and objectives derived from the plan are under regular review.

6.3.1 Quality Management

The CAACI is introducing an IT system (CENTRIC) to complement and improve the Quality Management System (QMS). This will affect the development of the SSP and will be monitored as part of the regular project reviews.

6.3.2 Performance Indicators

Performance indicators of both CAACI and its service providers' activities are still in development. This development step is captured in the SSP implementation plan. However, routine audits and inspections carried out by or on behalf of the CAACI will focus on the progress being made towards the establishment of effective SPI.

6.4 External SSP Review and Audit

The CAACI is subject to regular assessment by ASSI to assure the UK DfT that the Authority is adequately fulfilling its role. The Assessment examines many areas of the CAACI operation. During the course of these Assessments, ASSI will examine the SSP and its component parts.

As identified previously, performance indicators that may provide a benchmark for SSP measurement are still in development. Data measuring service providers' levels of operation are collected and reviewed against the UK CAA data. Occurrence reports are low in volume and effort is being expended to promote 'just culture' and encourage open reporting. It is hoped that, in time, these sources of data will develop to provide the basis of a set of useful performance indicators.

6.5 Safety Data Collection Analysis and Exchange

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

6.5.1 Cayman Islands Mandatory Occurrence Reporting

The CAACI promotes and maintains an effective MOR system which can be accessed through its web site. The CAACI processes all MOR and tracks each item to a point where it can be closed. The relevant Inspector is alerted to each MOR and they are responsible for review and follow-up action where appropriate. The Authority also identifies high-risk occurrences and monitors trends to enable follow-up action with its industry partners.

MORs are currently entered into the CAACI's MOR Access data base and the information disseminated to the appropriate office for review and follow-up action where necessary. However, the Authority has set an objective to improve reporting through revision of the reporting process, promotion of both a just culture and a positive safety culture (see appendix E).

Work is underway to integrate the MOR system into the CAACI's **Centric** information management system and it is expected that MORs will migrate with plans to migrate across by the end of 2021.

The migration to the CAACI's **Centric** system will not only allow MORs to be managed more efficiently but it will enable information to be shared, in due course, with the European Coordination Centre for Accident and Incident Reporting System (ECCAIRS). Software to enable this will be provided by the European Commission Joint Research Centre through the UKCAA to facilitate the cross State collection, sharing and analysis of safety data. The UK Air Accident Investigation Branch (AAIB) has full access to this UK data.

ECCAIRS will soon allow service providers to access data to conduct their own safety analysis. The relatively small number of MORs contributed from the UK OTs still provide potentially valuable data to the overall UK dataset and will allow the UK OT service providers access to a larger dataset. This 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. These operations will be able to share safety data across their operations from all around the world.

The enforcement policy provides assurance that it is the intention of the CAACI 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.

6.5.2 Bird Strike Reporting

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 MOR within the Territory or through the UK CAA bird strike reporting system. This data is notified to ASSI and the relevant reports are forwarded to ICAO annually for inclusion in the ICAO Bird Strike Information System (IBIS).

6.6 Voluntary/Confidential Reporting System

The CAACI encourages voluntary reporting of incidents through the occurrence reporting process. The CAACI's system aligns with the UK CAA's for the processing, recording and disclosing of reports. It does not differentiate between mandatory and voluntary reports and meets the requirements of Annex 19, paragraph 5.1.2.

6.6.1 Confidential Human-Factors Incident Reporting Programme (CHIRP)

CHIRP is a UK organisation that seeks 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 has been promoted within the CAACI sphere of influence. More information can be found on the CHIRP web site at www.chirp.co.uk. CHIRP does not accept anonymous reports because of the difficulty in corroborating the information provided.

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.

6.7 Safety Data-driven Targeting of Oversight Areas of Greater Concern or Need

The CAACI is committed to developing systems that use data to establish areas that may require additional or enhanced oversight. In developing risk profiles for all elements of its aviation industry the CAACI will collate annually all available information including:

- a) service provider operational information;
- b) general UK OT data;
- c) foreign national aviation authority reports;
- d) public media sourced information to add to a risk profile;
- e) flight safety bulletins.

The CAACI will also review the annual reports issued by ICAO, IATA and UK safety data publications including the AAIB Report together with appropriate industry publications to ensure that it remains abreast of developments that can or could impact both positively or adversely on safety within its area of responsibility.

In addition, information derived from audit reports, occurrence reports, audit visit intelligence feedback, service provider hazard log information and any general day to day oversight data is shared within the Authority to target oversight across all the regulatory disciplines of the CAACI.

It is intended that this area of work will continue to develop and evolve over time. A current objective is to update and create processes to collect, share, analyse and monitor information that influences aviation safety to work towards developing a performance/risk based approach (see appendix E).

CHAPTER 7 CAYMAN ISLANDS STATE SAFETY PROMOTION

7.1 Internal Training, Communication and Dissemination of Safety Information

7.1.1 Internal SSP, SMS and Safety Training

Each post within the CAACI has a well-defined job description and applicants for these posts are assessed to ensure that they possess the required levels of competency and knowledge. Where gaps in either competency or knowledge are identified they will be addressed by a bespoke training plan to ensure that the successful applicant will be able to carry out his/her duties effectively. Progress is regularly reassessed and addressed through staff development goals as part of the Performance Path staff appraisal scheme. The staff induction process covers an overview of all areas including the SSP. CAACI inspectors have all completed SMS training and are subject to periodic refresher training.

7.1.2 Internal Communication and Dissemination of Safety Information

Internal safety information can be communicated via many forums amongst the CAACI team. The quarterly SIRC meetings provide an opportunity to exchange such information as do the quarterly staff meetings which are scheduled to follow the SIRC meetings. Although there are a series of formally scheduled meetings each year the culture of the organisation is such that any member of CAACI staff is encouraged to raise any safety concerns either to his/her functional head or direct to the D-GCA if necessary.

The quarterly Staff Meetings provide opportunities to educate and update all staff in relation to the progress of and the outcomes from the SSP and SMS. The SSP implementation plan provides further opportunities to promote and discuss the CAACI Safety Policy, Enforcement, QMS/SMS and Safety promotion.

7.2 External Training, Communication and Dissemination of Safety Information

7.2.1 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 OTAA's provide some input to both the content and provision of this training. Training sessions are also conducted with OTAA DCA staff at the OTSPC meeting. The CAACI supports the regular training events and webinars provided by ASSI to the OTs and also participates in relevant regional training initiatives.

7.2.2 External communication and dissemination of safety information

UK OT service providers have access to the UK CAA MOR summaries. A quarterly ASSI Safety Bulletin is published with information on SSP/SMS and safety related topics. The CAACI

website also provides information on safety related matters including the SMS and the SSP. The CAACI subscribes to the ASSI e-mail alert which offers both OTAAAs and their service providers advice on new and updated information. As part of its safety promotional programme, the Authority actively encourages industry to take advantage of this service.

CHAPTER 8 SUMMARY

Summary

The CAACI is committed to continuously improving its State Safety Programme. Consequently, this document is a living document and will be periodically updated as the Programme evolves. Many of the deficiencies identified within the ICAO SSP Gap Analysis, conducted in 2013, have already been addressed (see appendix C); others are either underway, or are planned for the future.

As a living document it will be subject to amendment and update as the CAACI itself and the service providers that it regulates develop and refine their respective processes in a continuous search for improvement.

The CAACI welcomes any questions, contributions or comments from industry or other regulatory bodies and these should be addressed to: civilaviation@caacayman.com, entering State Safety Programme, in the subject field.

For further information on the CAACI please visit our website at: www.caacayman.com

List of Appendices

Appendix:

- Appendix A Safety Policy – 30 July 2021
- Appendix B Enforcement Policy
- Appendix C ICAO Document 9859 Edition 3 SSP gap analysis conducted November 2013 OTSPC, updated: July 2021
- Appendix D SSP Workplan 2021-2023
- Appendix E Cayman Islands Civil Aviation Authority's Designations and Responsibilities
- Appendix F Description of the Cayman Islands Aviation Industry
- Appendix G ICAO - Eight Critical Elements of a Safety Oversight System.

**Appendix A to
Cayman Islands State Safety Programme dated
30 July 2021**

CAYMAN ISLANDS STATE SAFETY POLICY STATEMENT

The Civil Aviation Authority of the Cayman Islands (CAACI) is committed to developing and implementing effective strategies, regulatory frameworks and processes to ensure that aviation activities for which it has oversight responsibilities achieve the highest practicable level of safety performance. To this end the CAACI shall:

- 1) Define an Acceptable Level of Safety Performance (ALoSP) that the Authority will strive to achieve throughout its aviation system.
- 2) Comply with all applicable national and international regulatory requirements.
- 3) Deliver an effective oversight programme that meets the Cayman Islands obligations to international safety standards.
- 4) Implement data driven performance-based regulation, that is visibly risk based.
- 5) Proactively identify adverse risk trends within our aviation system and take action to mitigate them.
- 6) Provide the necessary resources to support the development and effective implementation of the Cayman Islands State Safety Programme (SSP).
- 7) Ensure the CAACI Safety Management procedures, and implemented regulation remains effective through continuous monitoring of key Safety Performance Indicators, safety initiatives, industry sector feedback, and from OTAA aviation Safety aggregates.
- 8) Collaborate and consult with aviation industry sectors to foster and promote Just Culture, to regularly address safety matters in partnerships with an aim to continuously enhance aviation safety.
- 9) Promote sound safety practices and a positive safety culture within the industry sectors based on established safety management principles.
- 10) Encourage safety information collection, analysis and exchange within the aviation system with the sole purpose of improving aviation safety.
- 11) Provide its staff with a safe working environment and equip them with proper skills, expertise and sufficient financial and human resources to discharge their safety oversight and management responsibilities competently.

**Appendix B to
Cayman Islands State Safety Programme dated
30 July 2021**

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.

The policy statements are listed on the following (2) pages.

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;
- 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.

Reviewed July 2021 including 2019 iSTARS updated questions

Key:

Additional question (2019)

Minor text change to question (2019)

Question removed (2019)

Answer: **Y = Yes** **N = No** **P = Partial**

CAACI – Civil Aviation Authority of the Cayman Islands Specific answer

ICAO Document 9859 Edition 3 SSP Gap Analysis – Updated July 2021

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
1.1-01	2	Has [State] established a national aviation legislative framework that addresses the proactive management of safety within the State?	UK	Y	Y	CAP1180 Notes OTs structure
			ASSI & CAACI	Y	Y	Yes – The national aviation legislative structure exercised through the UK Civil Aviation Act, UK Air Navigation Order (Overseas Territories) Order 2013, Overseas Territories Aviation Requirements (OTARs). The structure is identified in the Cayman Islands SSP document and is also described in the ASSI document, The Laws and Regulation in the UK Overseas Territories available on the ASSI website.
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 & CAACI			Yes – the reviews are triggered by events such as, direction from the UK Department for Transport, review of State letters, feedback from other UK Overseas Territory Aviation Authorities and/or Service Provider staff and following training events.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
1.2-01	1	Has the State identified the organisation that is responsible for coordinating the maintenance and implementation of the SSP?	UK			Yes – the Civil Aviation Authority of the Cayman Islands (CAACI) is responsible for the maintenance and implementation of the SSP.
			ASSI			
1.2-01	1	Has the State identified the organisation that is responsible for coordinating the maintenance and implementation of the SSP?	CAACI	Y	Y	
			UK			
1.2-02	1	Has the State established an SSP coordination group responsible for the implementation and maintenance of the SSP?	UK			Yes- this is managed by the CAACI's Director of Air Navigation through organisational meetings, regulatory and business plan processes and co-ordination with ASSI.
			ASSI			
1.2-02	1	Has the State established an SSP coordination group responsible for the implementation and maintenance of the SSP?	CAACI	N	Y	
			UK			
1.2-03	1	Has the State identified, defined and documented the State requirements, obligations, functions and activities regarding the establishment and maintenance of the SSP?	UK			Yes - this is within the CAACI business plan and job descriptions.
			ASSI			
1.2-03	1	Has the State identified, defined and documented the State requirements, obligations, functions and activities regarding the establishment and maintenance of the SSP?	CAACI	N	Y	
			UK			
1.2-04	1	Does the State have an SSP implementation plan in place, which includes the timing and sequencing of key tasks and responsibilities?	UK			Yes – following the original gap analysis conducted in November 2013 against the requirements of Doc 9859, an initial plan was implemented. This was updated again recently on the basis of the Doc 9859 (fourth edition) and the resulting gap-analysis was used to identify the on-going tasks that are reflected in the current plan. See Appendix D.
			ASSI			
1.2-04	1	Does the State have an SSP implementation plan in place, which includes the timing and sequencing of key tasks and responsibilities?	CAACI	P	Y	
			UK			
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			Yes - this commitment is stated in the CAACI Safety Policy statement. This is signed by the Director-General of Civil Aviation and is reviewed annually.
			ASSI			
1.2-05	1	Is there a documented statement about the provision of the necessary resources for the implementation and maintenance of the SSP?	CAACI	Y	Y	
			UK			
1.2-06	1	Are the organisations involved in the implementation and maintenance of the SSP provided with the necessary resources?	UK			Yes - the budgeting process and the authority of the D-GCA support this commitment.
			ASSI			
1.2-06	1	Are the organisations involved in the implementation and maintenance of the SSP provided with the necessary resources?	CAACI	Y	Y	
			UK	Y	Y	CAP1180
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	Yes – these are identified in the Cayman Islands SSP document.
			ASSI			
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?	CAACI	Y	Y	

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			
			CAACI			The CAACI is assessed by and works alongside ASSI. The SSP is regularly reviewed by the DANSR. The implementation plan is peer reviewed at each meeting of the Overseas Territories Safety Performance Council.
1.2-09	1	Does the head of the organisation responsible for the implementation and maintenance of the SSP coordinate the activities of the different State aviation organizations under the SSP?	UK	Y	Y	CAP1180
			ASSI			
			CAACI	P	Y	Yes, this activity is managed by the DGCA, as the accountable manager, through regular meetings with the Governor and the scheduled telecons with ASSI.
1.2-10	1	Has [State] established a safety policy?	UK	Y		CAP1180
			CAACI	N	Y	Yes- the State has established a Safety Policy. This is signed by the Director General of Civil Aviation and is reviewed annually. See Appendix A.
1.2-11	1	Is the State's safety policy endorsed by the State aviation authorities?	UK			
			CAACI	N	Y	Yes- the State has established a Safety Policy. This is signed by the Director General of Civil Aviation and is reviewed annually.
1.2-12	1	Is [State] safety policy reviewed periodically?	UK			
			CAACI	N	Y	Yes – every 12 months
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			
			CAACI	N	Y	Yes - the policy has been sent to every member of staff for comment. It will be posted in the CAACI Offices and on the CAACI website.
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?	UK	Y	Y	UK CAP1180 & Safety Plan
			ASSI			
			CAACI	P	Y	Yes - This is identified in the Cayman Islands SSP document
1.2-15	1	Has the SSP documentation been completed, approved and communicated/made accessible to all stakeholders?	UK			
			ASSI			
			CAACI	P	Y	Yes - this is identified in the Cayman Islands SSP document. It is posted on the CAACI web site.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			Yes, the SSP and associated documentation is stored in the CAACI's secure Centric system.
			CAACI	P	Y	
1.2-17	1	Does [State] have a periodic internal review mechanism for assurance of continuing improvement and effectiveness of its SSP?	UK			The Cayman Islands SSP is subject to a formal, internal review every 12 months. In addition, it is subject to peer review biannually at the Overseas Territories Safety Performance Council (OTSPC).
			ASSI			
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			Yes, operating regulations, guidance material and implementation policies are controlled documents and as such are subject to periodic review managed by the Centric system.
			ASSI			
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			This process is currently under review as part of the CAACI's updating of staff Job Descriptions – due to be completed by 31 December 2021.
			ASSI			
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	Y	Y	UK DfT AAIB
			ASSI			
1.3-02	2	Is the organization/authority for accident investigation functionally independent?	UK	Y	Y	UK DfT AAIB
			ASSI			
1.4-01	2	Has [State] promulgated an enforcement policy?	UK			Yes – Enforcement Policy has been produced iaw Annex 19 and ICAO document 9859. The Policy is contained in the CISSP and is posted on the CAACI website.
			ASSI			
			CAACI	P	Y	

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/Justification
1.4-02	2	Does [State] primary aviation legislation provide for the enforcement of the applicable legislation and regulations?	UK			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 which enables enforcement in the OTs.
			CAACI	Y	Y	
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			Yes - this is within the new enforcement policy 47, procedure and guidance papers 159/160. See Appendix B to CAACI SSP
			CAACI	P	Y	
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			Yes - this is within the new ASSI Enforcement Policy 47, procedure and guidance papers 159/160. See Appendix B to CAACI SSP. These are formally adopted by the CAACI.
			CAACI	Y	Y	
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			Yes - this is within the new ASSI Enforcement Policy 47, procedure and guidance papers 159/160. See Appendix B to CAACI SSP. These are formally adopted by the CAACI.
			ASSI	P	Y	
1.4-06	3	Does the SSP enforcement policy include provisions to protect the sources of information obtained from voluntary incident reporting systems?	UK			Yes - this is within the new ASSI Enforcement policy 47, procedure and guidance papers 159/160. See Appendix B to CAACI SSP. These are formally adopted by the CAACI.
			ASSI	P	Y	
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			Yes - the CAACI provides guidance to the industry on the initial review and acceptance of a service provider's SMS via detailed information promulgated on its web site.
			ASSI	P	Y	
			CAACI	P	Y	

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	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			These are under development to provide a comprehensive set of inspector procedures common to all disciplines of its oversight activities.
			ASSI	P	Y	
			CAACI	P	P	
2.1-01	2	Has the State promulgated harmonized regulations to require service providers to implement an SMS?	UK			Some OTARs co-align, but not all. A standardised text is being established based on Annex 19. The regulations (OTARs) will each contain a common text, when agreed.
			ASSI & CAACI	P	P	
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			Yes - the SMS OTAC was last updated in September 2019 and information provided on the CAACI web site was reviewed accordingly.
			ASSI & CAACI	Y	Y	
2.2-01	4	Has [State] accepted individual service provider's safety performance indicators and their respective target levels?	UK			In some areas – this activity is to be expanded in the next 18 months
			ASSI			
			CAACI	N	P	
			UK			In some areas – this activity is to be expanded in the next 18 months
2.2-02	4	Are the accepted safety performance indicators appropriate to the individual service provider's specific operational context?	ASSI			
			CAACI	N	P	
2.2-03	4	Does the State monitor the safety performance of the service provider?	UK			In some areas – this activity is to be expanded in the next 18 months
			ASSI			
			CAACI	N	P	
			UK			Yes – an SMS is required as an element of the Part 125 Approval.
2.2-04	2	Have the international general aviation (IGA) operators implemented SMS in accordance with Annex 19?	ASSI			
			CAACI	N	N	
2.2-05	2	Have all the approved training organizations in the State, in accordance with Annex 1, implemented SMS?	UK			Not applicable – there are no approved training organizations in the Cayman Islands.
			ASSI			
			CAACI	N	N A	

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			
			CAACI	N	Y	Yes - SM manuals are approved and the SMS functions are subject to audit.
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			
			CAACI	N	Y	Yes – subject to Option 1 organisations
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			
			CAACI	NA	NA	Not applicable – there are no such organizations in the Cayman Islands.
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			
			CAACI	N	Y	Yes- The approved ATS service provider has implemented an SMS
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			
			CAACI	N	Y	Yes- The approved operators of the Cayman Islands certified aerodromes have implemented an SMS
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			
			CAACI	N	N	Not yet, to be developed within a more mature system

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
2.3-02	2	Has the State established a process for the assessment of safety risk	UK			
			ASSI			
			CAACI	N	Y	Yes – the CAACI has established a process for the assessment of safety risk.
2.3-03	2	Has the State established a process for the mitigation of safety risks?	UK			
			ASSI			
			CAACI	N	Y	Yes – the CAACI has established a process for the mitigation of safety risk.
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			
			CAACI			Yes, currently by an audit and approval process.
3.1-02	4	Has [State] established a process for the initial review and acceptance of an individual service provider's SMS?	UK			
			ASSI			
			CAACI	P	Y	Yes – this process is described on the CAACI web site. A checklist has been established to assist inspectors in this task.
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			
			CAACI	N	P	In some areas – this activity is to be expanded in the next 18 months
3.1-04	4	Does the State's surveillance programme include an assessment of the effectiveness of the service provider's SMS?	UK			
			ASSI			
			CAACI	P	Y	Yes – the effectiveness of an SMS is assessed as part of the routine audit programme.
3.1-05	4	Does the State's SMS monitoring programme include a review of the service provider's hazard identification and safety risk assessment processes?	UK			
			ASSI			
			CAACI	P	Y	Yes – a service provider's hazard identification and risk assessment processes is assessed as part of the routine audit programme.
3.1-06	4	Does the State's 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			
			CAACI	N	P	In some areas – this activity is to be expanded in the next 18 months

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			
			CAACI	N	N	Not yet, to be developed within a more mature system* This is to be via a review by the Overseas Territories Safety Performance Council review, staff performance and business plan reviews.
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			
			ASSI			
			CAACI	N	Y	Partially, a SDCPS is in place and currently captures and stores safety data. The system is in the process of being extended to enable the aggregating and analysing of safety data.
3.2-02	3	Has the State established a voluntary safety reporting system to collect safety data and safety information not captured by the mandatory safety reporting systems?	UK			
			ASSI			
			CAACI	Y	Y	The same system supports both Mandatory and Voluntary reporting. However, CHIRP is also promoted as an option for additional voluntary reporting.
3.2-03	3	Has the State established and maintained a process to analyse the safety data and safety information from the SDCPS and associated databases?	UK			
			ASSI			
			CAACI	N	P	Partially, a SDCPS is in place and currently captures and stores safety data. The system is in the process of being extended to enable the aggregating and analysing of safety data.
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			
			CAACI	N	P	Yes, the state has established an acceptable level of safety performance (ALoSP) as defined by selected safety indicators. However, targets and alert levels have yet to be formally agreed.
3.2-05	4	Are the ALoSP safety indicators appropriate and relevant to the scope and complexity of the aviation activities?	UK			
			ASSI			
			CAACI			Not yet, to be developed within a more mature system*
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	UK			
			ASSI			
			CAACI	N	N	Not yet, to be developed within a more mature system*

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/Justification
		actions are taken for any undesirable trends or if safety performance targets are not achieved?				
3.3-01	4	Has the State developed a risk based surveillance programme to prioritize inspections, audits and surveys towards those areas of greater safety concern or need?	UK ASSI			
			CAACI	P	P	Partially – risk pictures are being developed for every service provider. As safety and performance intelligence is uploaded, CENTRIC, the CAACI's record management system will indicate areas of concern to enable prioritisation of oversight resource.
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			
			CAACI	N	P	Partially – risk pictures are being developed for every service provider. As safety and performance intelligence is uploaded, CENTRIC, the CAACI's record management system will indicate areas of concern to enable prioritisation of oversight resource.
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			
			CAACI			The current staff competency and development process reviews this. Staff currently attend the UK CAA SMS training and some have attended the UK CAA enhanced safety performance training.
4.1-02	1 2 3 4	Has the State developed and approved an SSP training plan for the personnel involved in the implementation and maintenance of the SSP?	UK ASSI			
			CAACI	P	Y	SSP/SMS competencies are recorded in the individual training records of those with roles in these areas.
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			
			CAACI	Y	Y	This is conducted through the Overseas Territories Safety Performance Council, its sub-committee, ASSI Board, Functional Managers meetings and Staff meetings. In addition, there are regular conference calls with ASSI together with training sessions and webinars.

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			Reporting data including hazard reports and safety information is shared among staff and to industry on an as required basis. The process is still evolving.
			ASSI			
4.1-05	1 2 3 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			Yes, the CAACI maintains regular contact with its own industry, ASSI and other OTs as required. This process is still evolving.
			ASSI			
4.1-06	1 2 3 4	Has State identified the competencies required to perform the activities as part of the implementation and operation of the SSP?	UK			Yes- competencies have been established for inclusion in individual Job Descriptions.
			ASSI			
4.1-07	1 2 3 4	Has [State] updated existing job descriptions to include safety management competencies and activities related to SSP implementation and maintenance?	UK			Yes- competencies have been established for inclusion in individual Job Descriptions which are currently being reviewed and updated.
			ASSI			
4.2-01	1 2 3 4	Does the State promote the sharing and exchange of safety information with and amongst its service providers?	UK			To some extent - this activity is to be expanded in the next 18 months
			ASSI			
4.2-02	1 2 3 4	Does the State's regulatory authority participate in regional and global aviation safety information sharing and exchange and facilitate the participation of their respective service providers?	UK			The CAACI relies upon ASSI for representation and dissemination of information coming out ICAO regional meetings including: ICAO RASG-PA, SSP implementation meetings hosted by CARSAM associates and regional DCA conferences.
			ASSI			
			CAACI	N	P	

No.	Eg. ICAO Phase	Aspect to be analysed or question to be answered [ICAO 9859 Document ref]	Use of the term State (Context)	2013 Answer	2021 Answer	Status/ Justification
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			First part Yes, but the assurance of effectiveness No. There is a process to externally disseminate regulatory document and information. The new management system aims to improve the monitoring of effectiveness, although this will take time to establish.
			ASSI			
4.2-04	1 2 3 4	s [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			SSP document contains this information, although safety indicators are not yet developed
			ASSI			
4.2-05	4	Has the State established safety promotion channels and media to support the promotion of a positive safety culture?	UK			Not yet, to be developed within a more mature system*
			ASSI			
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			Not yet, to be developed within a more mature system*
			ASSI			
			CAACI			
			CAACI			
			CAACI	N	N	
			CAACI	N	N	

UK – UK State, answered where applicable

ASSI – Air Safety Support International, answered where applicable

Not yet, to be developed within a more mature system, this refers to the outlined Annex 19 system.

**Appendix D to
Cayman Islands State Safety Programme dated
30 July 2021**

Cayman Islands SSP Workplan 2021-2023

Aim: To enhance the effectiveness of its safety regulation by developing an SSP that is compliant with ICAO SARPS. In doing so, the Authority will address the complex requirements in a methodical and structured manner to ensure that the safety benefits delivered by the SSP can be identified and embraced by its staff wherever they may be assigned.

The current plan seeks to further develop the SSP by addressing the remaining RED and AMBER items in the gap-analysis over an 18-month period. The period will be divided into three 6-month sections with all the outstanding RED items (see list) to be completed by 30 June 2022. During the course of the following twelve months, the remaining items will be addressed; however, this is an ongoing process requiring collaboration and feedback from industry which may result in the implementation of a fully effective SSP being extended beyond 30 June 2023.

Period 1 Present - 30 June 2022

- | | |
|--------|---|
| 4.1-05 | Has the State established formal communication channels between the members of the SSP Coordination Group (State entities involved in implementing and maintaining the SSP)? |
| 4.1-06 | Has State identified the competencies required to perform the activities as part of the implementation and operation of the SSP? |
| 4.1-07 | Has [State] updated existing job descriptions to include safety management competencies and activities related to SSP implementation and maintenance? |
| 1.2-19 | Has [State] assessed the organizational structure to determine if any changes are needed to support the implementation and maintenance of the SSP? |
| 1.5-02 | Has the State established inspector procedures for the initial review and acceptance of a service provider's SMS? |
| 2.3-01 | 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? |
| 3.2-01 | 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? |
| 3.2-03 | Has the State established and maintained a process to analyse the safety data and safety information from the SDCPS and associated databases? |

Period 2 01 July 2022 - 31 December 2022

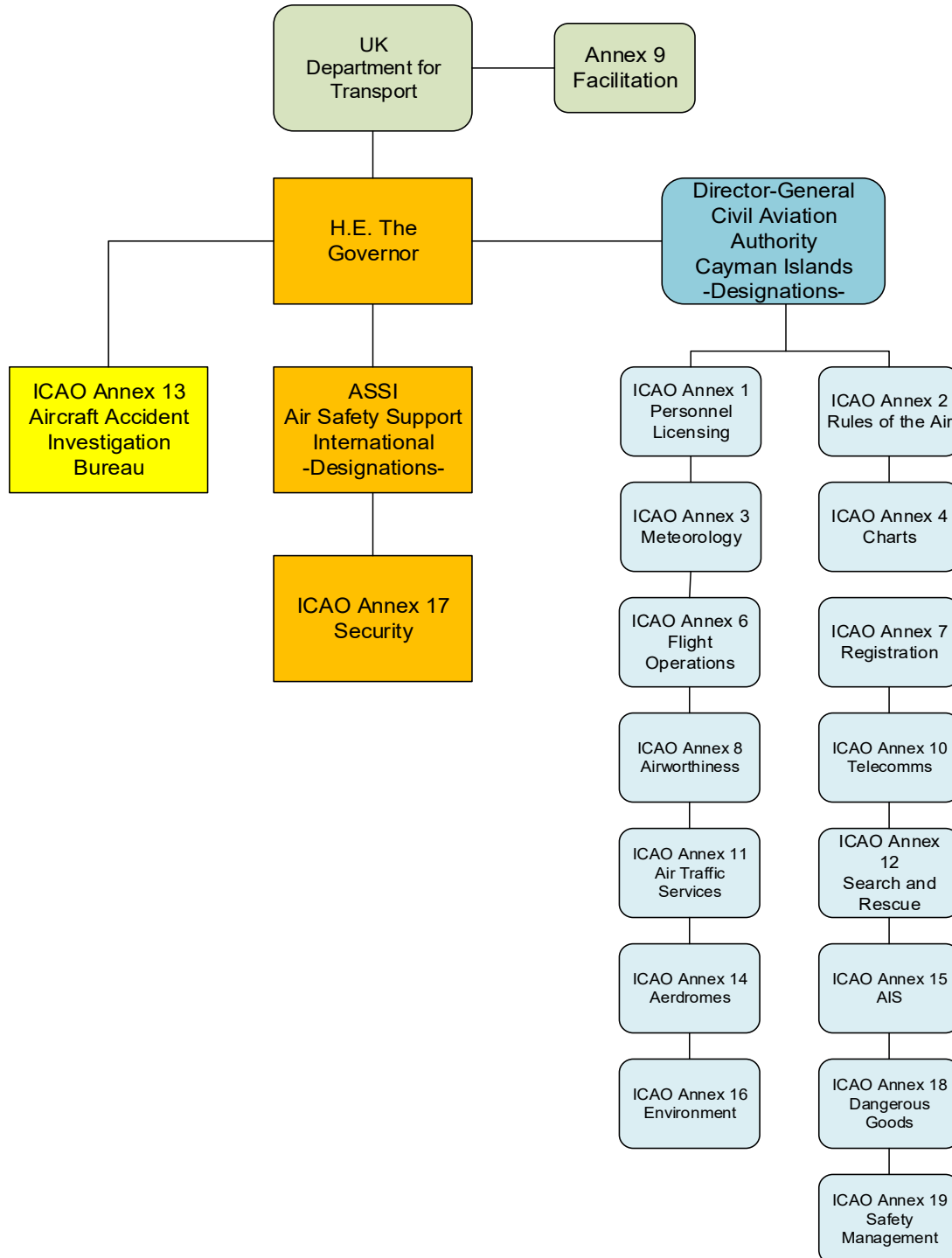
- 2.1-01 Has the State promulgated harmonized regulations to require service providers to implement an SMS?
- 2.2-01 Has [State] accepted individual service provider's safety performance indicators and their respective target levels?
- 2.2-02 Are the accepted safety performance indicators appropriate to the individual service provider's specific operational context?
- 2.2-03 Does the State monitor the safety performance of the service provider?
- 3.1-03 Has [State] established procedures for the review of individual service provider's safety performance indicators and their relevant alert/target levels?
- 3.1-06 Does the State's 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?
- 3.2-04 Has [State] established an acceptable level of safety performance (ALoSP) as defined by selected safety indicators with corresponding target and alert levels as appropriate?
- 3.2-06 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?
- 3.3-01 Has the State developed a risk-based surveillance programme to prioritize inspections, audits and surveys towards those areas of greater safety concern or need?
- 3.3-02 Is the prioritization of inspections and audits associated with the analysis of relevant internal/external safety or quality data?

Period 3 01 January 2023 – 30 June 2023

- 4.2-01 Does the State promote the sharing and exchange of safety information with and amongst its service providers?
- 4.2-02 Does the State's regulatory authority participate in regional and global aviation safety information sharing and exchange and facilitate the participation of their respective service providers?
- 4.2-05 Has the State established safety promotion channels and media to support the promotion of a positive safety culture?
- 4.2-06 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?

**Appendix E to
Cayman Islands State Safety Programme dated
30 July 2021**

Cayman Islands Civil Aviation Authority's Designations and Responsibilities



**Appendix F to
Cayman Islands State Safety Programme dated
30 July 2021**

Description of the Cayman Islands Aviation Industry

1. Introduction

The Cayman Islands is a group of three islands, Grand Cayman, Little Cayman and Cayman Brac, situated in the Caribbean, south of Cuba and west of Jamaica. The population of the Islands total some 70,000 with the majority, some 65,000 living on the main island of Grand Cayman.

The Cayman Islands aviation system comprises three main elements, its airports, its aircraft register and the associated maintenance and support organisations.

2. Cayman Islands Airports

The Cayman Islands has two certified, international airports, Owen Roberts International Airport on Grand Cayman, serving as the gateway to the Islands and Charles Kirkconnell International Airport on Cayman Brac.

Both airports are owned and operated by the Cayman Islands Airports Authority (CIAA), a statutory authority enabled by the Cayman Islands Airports Authority Law (2005 Revision).

The CIAA airports are certified to international standards in accordance with the regulations identified in the following section and safety oversight is provided by the Air Navigation Services Regulatory Division of the CAACI.

A third, uncertified facility, Edward Bodden Airfield serves Little Cayman. The airfield is operated by Cayman Airways Express to support its scheduled DHC-6 Twin Otter, inter-islands services.

2.1 Movement Figures

The 2019, pre Covid activity can be established from the following aircraft movement figures:

Owen Roberts International Airport (MWCR)	27,286 (3% growth on 2018)
Charles Kirkconnell International Airport (MWCB)	5,287 (4% growth on 2018)
Edward Bodden Airfield (MWCL)	4,334 (1.5% growth on 2018)

2.2 Airport Activity

Passengers

2019	1,389,853	(11.4 growth on 2018)
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Freight

2019	1, 028,605 kgs	(7.3% reduction on 2018)
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Mail

2019	105, 896 kgs	(7% decrease on 2018)
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3. Cayman Islands Aircraft Register and Associated Service Providers

The Cayman Islands aircraft register is a global operation with aircraft operating under approvals issued under:

OTAR Part 121 – Commercial Air Transport Operations (large aircraft);

OTAR Part 125 – Complex General Aviation including Corporate Operations; and,

OTAR Part 135 -- Commercial Air Transport Operations (helicopters and small aircraft)

ICAO Article 83*bis* – Commercial and Private Operations (large and corporate aircraft)

In addition, there are aircraft in Controlled Environments, managed by assigned and Approved Continuing Airworthiness Management Organisations. These are project aircraft known as Transition aircraft and are not regularly operated.

3.1 Cayman Islands Aircraft Register

An active aircraft register is, by definition, a living entity. However, to assess the activity and growth of the register the following information is provided based on the years 2019 compared with 2018:

OTAR Part 121 - 04 aircraft representing 0% growth (stable) - 1 operator;

OTAR Part 125 - 228 aircraft representing 0% growth (stable) - 64 operators;

OTAR Part 135 - 07 aircraft representing 0 % growth (stable) - 6 operators;

ICAO Art 83*bis* - 42 aircraft representing 2.43% growth – 6 operators;

3.2 Cayman Islands Aircraft Register (Transition Aircraft)

An active aircraft register is, by definition, a living entity. To assess the status of the Transition register at a point in time, the following information is provided as at 31 December 2019 compared to 31 December 2018:

OTAR Part 125 - 12 aircraft representing 20% growth.

3.3 Maintenance Organisations

3.3.1 Aircraft Maintenance Organisations

Service providers to the Cayman Islands aircraft register is, by definition, a living entity. To assess the status of Approved Aircraft Maintenance Organisations at a point in time, the following information is provided as at 31 December 2019 compared to 31 December 2018:

OTAR Part 145 Organisations - 165 representing 1.22% growth.

3.3.2 Continuing Airworthiness Management Organisations

Service providers to the Cayman Islands aircraft register is, by definition, a living entity. To assess the status of Approved Continuing Airworthiness Management Organisations at a point in time, the following information is provided as at 31 December 2019 compared to 31 December 2018:

OTAR Part 39 Organisations - 81 representing 5.19% growth.

4. Cayman Aviation Industry Mandatory Occurrence Reports (MOR)

During the 12 months ending 31 December 2018 the Cayman Islands aviation industry submitted a total of 122 MORs. During the same period ending 31 December 2018, 121 MORs were submitted. Both figures exclude non-damaging bird strikes.

**Appendix G to
Cayman Islands State Safety Programme dated
30 July 2021**

ICAO - Eight Critical Elements of a Safety Oversight System.

CE-1. Primary aviation legislation.

The provision of a comprehensive and effective aviation law consistent with the environment and complexity of the State's aviation activity and compliant with the requirements contained in the Convention on International Civil Aviation.

CE-2. Specific operating regulations.

The provision of adequate regulations to address, at a minimum, national requirements emanating from the primary aviation legislation and providing for standardized operational procedures, equipment and infrastructures (including safety management and training systems), in conformance with the Standards and Recommended Practices (SARPs) contained in the Annexes to the Convention on International Civil Aviation.

Note.— The term “regulations” is used in a generic sense to include but is not limited to instructions, rules, edicts, directives, sets of laws, requirements, policies, and orders.

CE-3. State civil aviation system and safety oversight functions.

The establishment of a Civil Aviation Authority (CAA) and/or other relevant authorities or government agencies, headed by a Chief Executive Officer, supported by the appropriate and adequate technical and non-technical staff and provided with adequate financial resources. The State authority must have stated safety regulatory functions, objectives and safety policies.

Note.— The term “State civil aviation system” is used in a generic sense to include all authorities with aviation safety oversight responsibility which may be established by the State as separate entities, such as: CAA, Airport Authorities, Air Traffic Service Authorities, Accident Investigation Authority, and Meteorological Authority.

CE-4. Technical personnel qualification and training.

The establishment of minimum knowledge and experience requirements for the technical personnel performing safety oversight functions and the provision of appropriate training to maintain and enhance their competence at the desired level. The training should include initial and recurrent (periodic) training.

CE-5. Technical guidance, tools and the provision of safety-critical information.

The provision of technical guidance (including processes and procedures), tools (including facilities and equipment) and safety-critical information, as applicable, to the technical personnel to enable them to perform their safety oversight functions in accordance with established requirements and in a standardized manner. In addition, this includes the provision of technical guidance by the oversight authority to the aviation industry on the implementation of applicable regulations and instructions.

CE-6. Licensing, certification, authorization and approval obligations.

The implementation of processes and procedures to ensure that personnel and organizations performing an aviation activity meet the established requirements before they are allowed to exercise the privileges of a licence, certificate, authorization and/or approval to conduct the relevant aviation activity.

CE-7. Surveillance obligations.

The implementation of processes, such as inspections and audits, to proactively ensure that aviation licence, certificate, authorization and/or approval holders continue to meet the established requirements and function at the level of competency and safety required by the State to undertake an aviation related activity for which they have been licensed, certified, authorized and/or approved to perform. This includes the surveillance of designated personnel who perform safety oversight functions on behalf of the CAA.

CE-8. Resolution of safety concerns.

The implementation of processes and procedures to resolve identified deficiencies impacting aviation safety, which may have been residing in the aviation system and have been detected by the regulatory authority or other appropriate bodies.