

# Bermuda State Safety Programme (SSP)

## Amendment Record

Issue	Date	Notes
1	April 2015	BDCA Initial
2	November 2018	BCAA Revision – Revision
3	July 2019	BCAA Revision – Reflect AAIB 2018 Regulations
4	December 2023	BCAA Revision – Align with ASSI’s OT SSP revision and OTSPC discussions
5	January 2024	BCAA Revision – Align with the updated Safety & Quality Policy

## Foreword

Annex 19 to the Chicago Convention (applicable 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). The UK has established legislation dealing with civil aviation in the OTs.

The Governor, as the appointed representative of the UK in Bermuda, 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 promulgated and sets out the provisions to enable the UK to comply with 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 who has been 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 Bermuda Civil Aviation Authority (BCAA) has developed a Safety Oversight Management System (SOMS) to implement the SSP in Bermuda and manage the effectiveness and sustainability of the BCAA's regulatory and safety oversight programmes. It is made up of a comprehensive set of policies, each of which is supported by procedures. These policies are designed to continuously identify and establish priorities, to manage the administration of the Authority's mandate, and to guide BCAA's regulatory and safety oversight programmes.

BCAA-regulated industry involvement is essential to the development of an effective SSP, and I would welcome any comments on this document to be sent for my attention, to [info@bcaa.bm](mailto:info@bcaa.bm).

Tariq Lynch-Wade  
Director General (Acting)  
Bermuda Civil Aviation Authority

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<sup>1</sup> Bermuda, as an Overseas Territory of the United Kingdom, is not an ICAO Contracting State in its own right. The use of the term "State" in this paper reflects that Bermuda is exercising state functions on behalf of the United Kingdom.

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## Overview

- A. ICAO describes an SSP as “an integrated set of laws, regulations, policies, objectives, processes, and activities aimed at proactively managing safety”. The effectiveness of a State’s safety management activities is strengthened when formally implemented through an SSP. The SSP, coupled with the Safety Management System (SMS) of its service providers, systematically addresses safety risks, improves the safety performance of each service provider, and proactively manages the State’s safety performance.
- B. The SSP assists the State in establishing safety performance indicators (SPIs) to measure and monitor the State’s progress towards achieving its safety objectives.
- C. ICAO standards for an SSP are contained in Annex 19, with supporting information contained in ICAO Doc 9859, from which Bermuda’s SSP has been developed.
- D. Bermuda’s SSP chapter 1 describes the State’s high-level overview along with the underpinning legal structures. The remaining chapters focus on the BCAA’s safety oversight operations.



Picture 1 – Bermuda registered aircraft visiting Bermuda.

## Abbreviations and Acronyms

AAIB	UK DfT Air Accidents Investigation Branch
AIP	Aeronautical Information Publication
ANO	Air Navigation Order
AN(OT)O	Air Navigation (Overseas Territories) Order
ASSI	Air Safety Support International
ATM	Air Traffic Management
BCAA	Bermuda Civil Aviation Authority
CAA	UK Civil Aviation Authority
DCA	Department of Civil Aviation
DfT	UK Department for Transport
EASA	European Union Aviation Safety Agency
FCDO	Foreign, Commonwealth & Development Office
ICAO	International Civil Aviation Organisation
MOR	Mandatory Occurrence Report
MoU	Memoranda of Understanding
OTs <sup>1</sup>	UK Overseas Territories
OTAA	Overseas Territories Aviation Authorities
OTACs	Overseas Territories Aviation Circulars
OTARs	Overseas Territories Aviation Requirements
PQs	Protocol Questions
RASG-PA	Regional Aviation Safety Group – Pan America
SAFA	Safety Assessment of Foreign Aircraft
SAR	Search and Rescue
SARPs	ICAO Standards and Recommended Practices
SMS	Safety Management System
SOMSCOM	Safety Oversight Management System Committee
SPI	Safety Performance Indicator
SSP	State Safety Programme
SSPIA	State Safety Programme Implementation Assessment
USOAP	ICAO Universal Safety Oversight Audit Programme

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<sup>1</sup> References to OTs in this document are to the OTs of Bermuda, Cayman, Falklands, and Turks and Caicos.

Chapter 1 – Bermuda’s Aviation Regulatory System

**1.1 Introduction**

- 1.1.1 Overseas Territories (OTs) of the UK are not ICAO Contracting States in their own right. The use of the term “State”, in this document, reflects that Bermuda is responsible for developing its own SSP as part of the UKSSP.
- 1.1.2 The Director General of the BCAA has been designated by the Bermuda Governor with accountabilities and responsibilities for aviation safety oversight.
- 1.1.3 This chapter sets out the regulatory structure which applies to Bermuda as an Overseas Territory (OT) of the UK.

**1.2 The UK OTs**

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

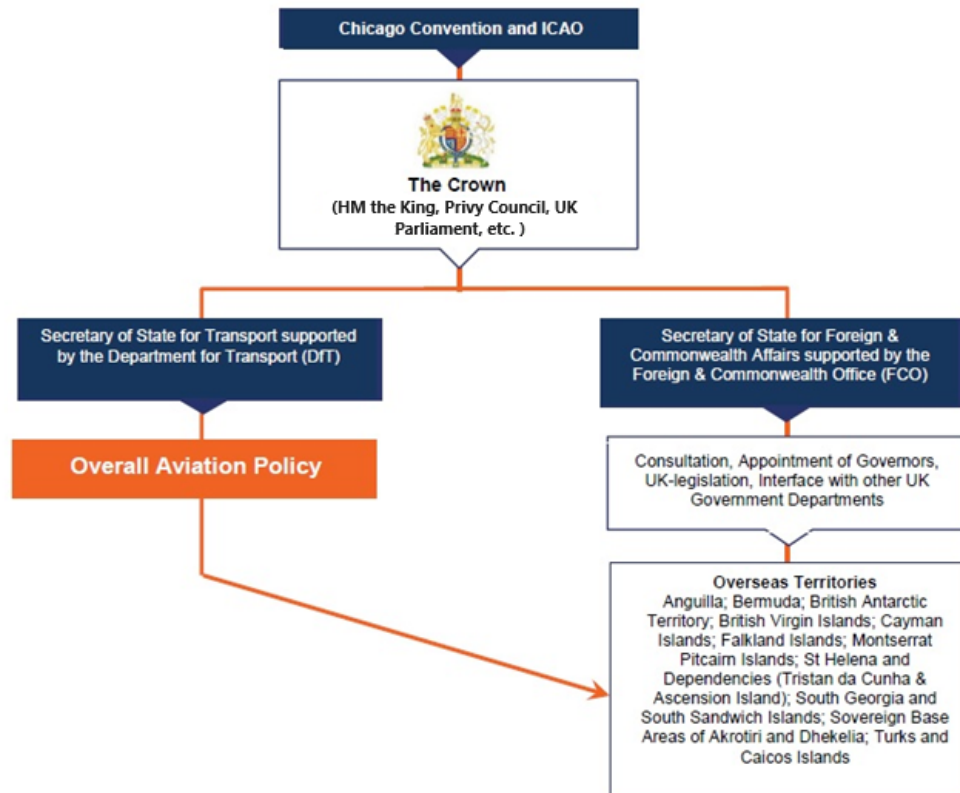


Figure 1- The UK as a Contracting State to ICAO (Simplified constitutional relationship between ICAO, UK and its OTs, note that not all have aviation activity)



- 1.2.2 The 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 the UK, in cooperation with the Foreign and Commonwealth Office (FCO) for the Overseas Territories. The UK CAA has no direct regulatory responsibility for the safety oversight of aviation in the UK OTs.
- 1.2.3 There are fourteen UK Overseas Territories, which retain a constitutional link with the UK. All have separate constitutions made by a UK Order in Council. The UK remains responsible, however, for discharging its obligations under the Chicago Convention in respect of civil aviation in the OTs.
- 1.2.4 Parts of the 1949 and 1982 Civil Aviation Acts have been extended to the OTs by Orders in Council. The Air Navigation (Overseas Territories) Order (AN(OT)O) gives the Governor of Bermuda powers and responsibilities in respect of aviation safety oversight.
- 1.2.5 The AN(OT)O 2013 (as amended) requires the Governor to designate the majority of their powers, which they do to the Director General of the Bermuda Civil Aviation Authority. The Governor is required to consult with ASSI before making (or revoking) any such designation.
- 1.2.6 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 from ASSI’s responsibilities.
- 1.2.7 ASSI has been charged with developing and maintaining the AN(OT)O, OTARs and OTACs in order to implement the SARPs. ASSI is also responsible for providing training and advice to the OTs, while ensuring regular assessments are conducted on the standards of civil aviation safety regulation and the adequacy of the resources employed, to assure the Governor that their designations are being discharged effectively.
- 1.2.8 ASSI is the designated regulator responsible for Annex 17 (Security) within all the UK OTs.

Chapter 2 – SSP Component 1 – Bermuda Safety Policy, Objectives & Resources

**2.1 Primary Aviation Legislation**

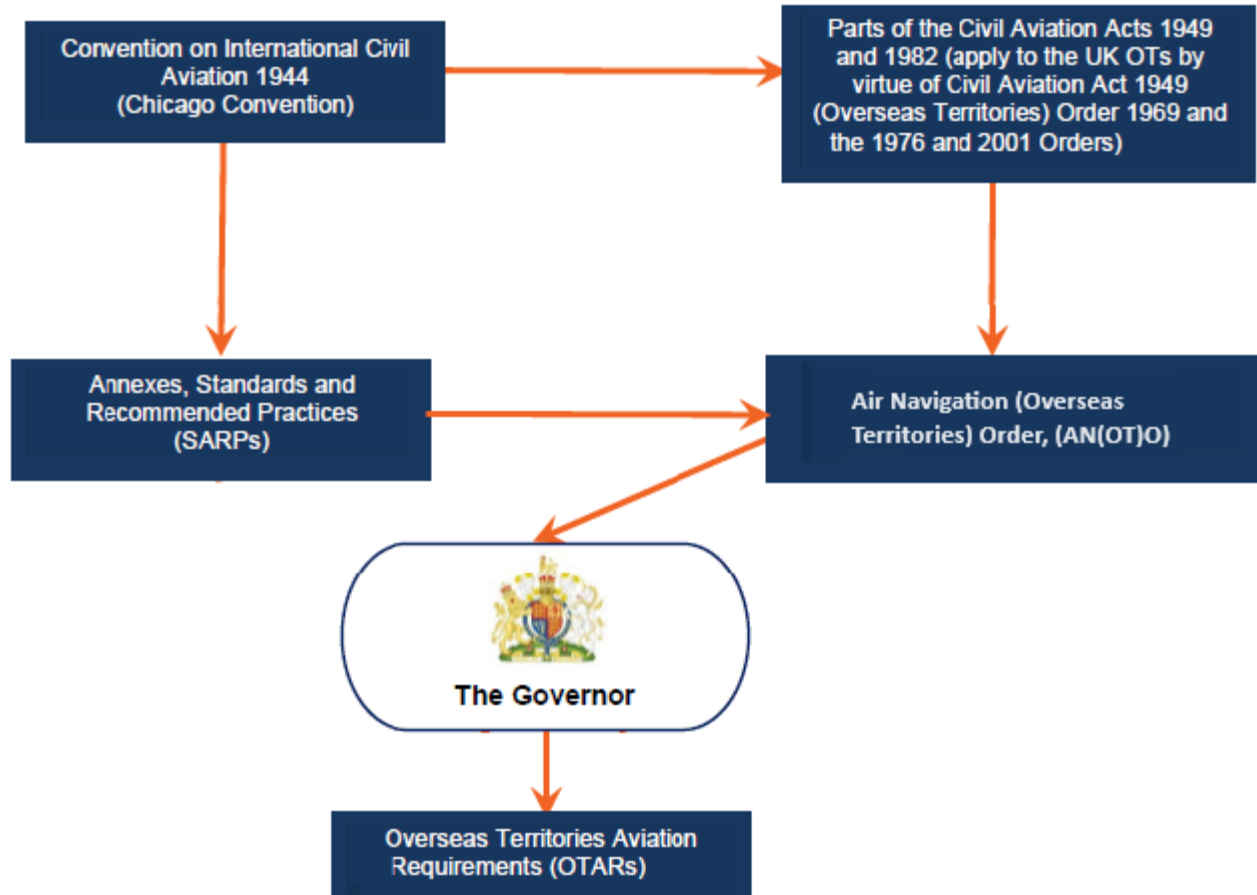


Figure 2- UK Overseas Territories Regulatory Framework (Adapted from UK OT SSP Document)

- 2.1.1 Civil Aviation Act 1949 (Overseas Territories) Order 1969 – The Civil Aviation Act 1949, as extended to the OTs by the Civil Aviation Act 1949 (Overseas Territories) Order 1969 is the primary legislation that provides authority to apply the provisions of the Chicago Convention and Annexes by the Order in council and implement other statutory instruments in the area of civil aviation in the OTs.
- 2.1.2 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.
- 2.1.3 Air Navigation (Overseas Territories) Order 2013 – The AN(OT)O provides a sound legal framework which enables the adoption of the Overseas Territories Aviation Requirements (OTARS) and gives power to the requirements contained therein.
- 2.1.4 The AN(OT)O affords the Governor a wide range of discretionary powers which are delegated to and exercised by the designated regulator to grant certificates, licenses and approvals. An individual or organisation affected by certain decisions made by the regulator on behalf of the Governor is entitled to seek a review by the Governor of such decisions in accordance with Article 13 of the AN(OT)O.

## **2.2 Specific Operating Regulations/Requirements**

2.2.1 Overseas Territories Aviation Requirements (OTARs) – The OTARs, produced by ASSI under the directions of the Secretary of State, are a means of compliance with the ICAO SARPs to enable the Governor to be satisfied that holders of licences, certificates, and approvals meet legal obligations. Governors are required to publish OTARS under Article 5 of the AN(OT)O.

2.2.2 The OTARs set out:

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

## **2.3 Technical Guidance Tools**

2.3.1 Overseas Territories Aviation Circulars (OTACs) – To aid with the interpretation of specific regulations, additional industry guidance, not appropriate for the OTARs, is developed and promulgated in the form of OTACs.

2.3.2 OTACS include the following information:

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

## **2.4 State Safety Programme Documentation**

2.4.1 This SSP document is reviewed regularly and is available on the BCAA website. It is based on the current ICAO Annex 19 and Document 9859 Safety Management Manual.

2.4.2 BCAA’s document & records management system, SharePoint and website ([www.bcaa.bm](http://www.bcaa.bm)) facilitate the operation of many SSP functions.

## **2.5 Safety Programme Responsibilities and Resources**

2.5.1 Each OT is responsible for providing its own specific SSP. The BCAA’s Director General is accountable for Bermuda’s SSP and the resource allocations to sustain it. The Director of Safety Oversight is responsible for the development and operation of the SSP.

## **2.6 SSP Coordination Committees**

2.6.1 The ASSI CEO is a member of the UK Aviation Safety Strategy Board; this facilitates coordination with the overall UK State activities. Where applicable, and required, ASSI staff attend UK State level SSP-related meetings that affect the UK OTs. The UK DfT and FCDO each have a non-Executive appointee to the ASSI Board of Directors.

2.6.2 The OTSPC, co-chaired by the ASSI CEO and a UK OT DCA, meets twice a year where it regularly reviews the SSP progress and activities of the UK OTs. The OTSPC’s vision is to improve safety performance in the OTs and set the benchmark for others.

- 2.6.3 ASSI liaises with UK OT Governors and agencies, where required, to progress SSP implementation and activities. ASSI is looking to strengthen these to further support OT SSP developments.
- 2.6.4 Bermuda is an active member of the ICAO Regional Aviation Safety Group – Pan America (RASG-PA). The RASG-PA serves as a vital platform to promote aviation safety and to raise awareness on safety concerns in the Pan-America Region. This working group guarantees seamless coordination of safety initiatives and develops products to enhance civil aviation safety.
- 2.6.5 Within the BCAA, monthly SOMSCOM meetings review the BCAA’s operations and SSP activity including occurrence reports, risk assessments and internal safety investigations. The BCAA is looking to increase collaboration within Bermuda’s aviation industry, aiming to raise SSP awareness and gather essential data required for its integration.

## **2.7 BCAA Safety & Quality Policy**

- 2.7.1 BCAA’s safety & quality policy is regularly reviewed and available via the BCAA website, the BCAA Intranet and contained in Appendix A.

## **2.8 Performance Measurement**

- 2.8.1 BCAA proactively measures the effectiveness of its regulatory programme and of the aviation industry’s safety risk management so it can systematically implement priorities to sustain or improve the Authority’s and industry’s performance.
- 2.8.2 The SOMSCOM manages the progress of Bermuda’s SSP implementation plans at each meeting. As implementation plans progress, a revised SSP gap analysis is conducted. A record of Bermuda’s current SSP gap analysis is held within the ICAO iSTARS system.
- 2.8.3 BCAA publishes a safety plan that captures performance goals and objectives of the organisation, which are linked to the ICAO Global Aviation Safety Plan (GASP), alongside the safety performance indicators (SPIs). The safety plan is revised annually and accepted through the SOMSCOM.
- 2.8.4 The Safety Plan highlights the areas it has determined need improving, so that initiatives by ASSI, BCAA and the aviation industry can be coordinated. The Safety Plan enables the necessary resources to be budgeted, and for responsibilities to be assigned, and activities coordinated. In this way, the Authority’s safety management is integrated with business planning. Achievements and improvements in BCAA’s performance are measured and reported every year as part of the published Safety Plan.

## **2.9 Human Resources**

- 2.9.1 BCAA fulfills its mandate by employing a sufficient number of qualified staff, through the use of manpower planning calculations, who work in an environment that is conducive to their personal and professional development. The Authority is structured to consistently and efficiently achieve its objectives. Performance standards, accountabilities and responsibilities are clearly defined and adhered to. Managers and staff are skilled, competent, equipped and supported in the fulfilment of their responsibilities. Succession planning aims to sustain performance. Changes in the aviation industry and organisational priorities are anticipated so that staffing requirements can be both efficiently and effectively addressed.

## 2.10 Finance

2.10.1 Business priorities are determined by the risk profile and guide the Safety Plan and the implementation of the regulatory programme. Business planning looks out three years, and changing priorities are examined for their implications on long term financial requirements.

## 2.11 Change Management

2.11.1 BCAA proactively manages aviation safety hazards resulting from changes to its processes or services. In this way, the Authority optimises its performance during periods of change. BCAA systematically manages the risks associated with change, by planning thoroughly and mitigating the associated hazards and risks. Change management is a standing topic of discussion at the monthly SOMSCOM meetings.

## 2.12 Bermuda Accident and Incident Investigation

2.12.1 The AAIB is the accident investigation authority for Bermuda for the purpose of carrying out investigations into accidents and serious incidents in accordance with the Civil Aviation (Investigation of Air Accidents and Incidents) Regulations 2018.

2.12.2 The Bermuda Police Service (BPS) has been nominated on behalf of and under the instruction of the AAIB to secure and preserve evidence with kits provided by the AAIB. The AAIB delivers training to Bermuda on actions to be taken in the event of an accident or serious incident occurring in and around the island.

## 2.13 Bermuda Enforcement Policy

2.13.1 It was agreed by the OTAAAs and ASSI that a common enforcement policy would be adopted by all OTAAAs, Policy No. 47. The policy is based on ICAO 9859 Safety Management Manual guidance and is reviewed regularly. The policy is available on the ASSI website.

2.13.2 The BCAA enforcement procedure that accompanies the policy recognises that enforcement covers a range of activities from routine everyday oversight to powers that enable the prevention of flight, suspension, variation or revocation of a licence or certificate, and ultimately, prosecution. In line with the AN(OT)O, the procedure provides a right of review. The policy and procedure support a consistent approach to enforcement that takes into account the performance of the service provider's Safety Management System (SMS), voluntary reporting, and each case's circumstances. It is based on the overall aim of achieving compliance and safe operations.

2.13.3 If a case progresses to prosecution following investigation by the Bermuda Police Service (BPS), the BPS will forward the case to the Department of Public Prosecution (DPP). A failure to comply with the AN(OT)O and its related requirements may be a criminal offence. It is of note that in any such case, it is important to ensure that any safety issue is addressed without waiting for prosecution to finish, as the prosecution process will not achieve this. Care must be taken to not prejudice any prosecution case, but adequately address the safety issue.

## Chapter 3 – SSP Component 2 – Bermuda Safety Risk Management

### 3.1 Risk Management

- 3.3.1 Performance data is analysed to identify and prioritize information related to hazards, system safety deficiencies and other forms of performance deficiencies. This information is used to update the BCAA risk register – a documented, high-level overview of the risks the BCAA faces in the fulfilment of its mandate. This register is used to assist managers in setting priorities in their day-to-day operations; and to help determine longer-term goals, objectives and SPIs to improve the safety systems of the Authority and the aviation industry.

### 3.2 BCAA Safety Plan

- 3.2.1 Safety improvements cannot be delivered without the BCAA’s engagement with all stakeholders. BCAA develops and publishes an annual Safety Plan as a public document. By outlining the priorities for the Authority and for Bermuda’s aviation industry, and by highlighting the Authority’s accomplishments, the Safety Plan achieves two important results. First, it provides information that allows the various organizations that make up Bermuda’s aviation industry to align their activities with each other and with their regulator. In this way, the effectiveness and efficiency of the civil aviation system will be maintained. Second, it holds the Authority accountable to the Governor, to Air Safety Support International (ASSI) and to the industry for achieving its objectives. Each contributes to the continued strengthening of Bermuda’s safety oversight system and to ongoing improvements in the SSP.

### 3.3 Safety Oversight Management Committee (SOMSCOM)

- 3.3. BCAA has established a committee to review the effectiveness of the SSP and develop initiatives to improve them. The committee meets each month to review safety data and to develop initiatives to maintain the BCAA’s management of safety risks. In addition, short-term action plans are developed to aid the aviation industry in managing hazards and reducing safety-risk.

### 3.4 Safety Requirements for the Service Provider’s SMS

- 3.4.1 The purpose of an SMS is to provide service providers with a systematic approach to managing safety. It is designed to continuously improve safety performance through: the identification of hazards; the collection and analysis of safety data and safety information; and the continuous assessment of safety risks. An SMS allows service providers to effectively manage their activities, safety performance and resources, while gaining a greater understanding of their contribution to aviation safety.
- 3.4.2 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, however all elements of the SMS framework apply. Some of the processes within a safety management system, as noted by ICAO 9859 Safety Management Manual, can be integrated into existing systems such as quality management or security management systems which may already be employed by service providers. The approach to fully implement SMS is to evolve elements over time and, where possible, integrate these into other established systems.
- 3.4.3 Regulatory oversight inspections review services providers’ systems and processes. Hazard logs, safety meetings and reporting are the continued core focus. The BCAA’s has developed an SMS Tool using guidance material from the Safety Management International Collaboration Group (SMICG). This tool accompanies each SMS assessment completed by the BCAA.



3.4.4 ASSI has developed a standard SMS requirement text based on Annex 19 that is appended to the relevant OTARs. This text is currently published within the SMS OTAC. This text has explicitly listed safety reporting and investigation processes to highlight the important part these play in hazard identification. The following OTARs require an SMS to be established appropriate to the scope of the operation:

- OTAR 61 Pilot Licenses and Ratings (Training Organisation)
- OTAR 65 Air Traffic Services Personnel Licensing, Ratings and Training Organisation Approval
- OTAR 66 Aircraft Maintenance Personnel Licensing (Training Organisation)
- OTAR 119 Air Operator Certification
- OTAR 125 Complex General Aviation (including Corporate Operations)
- OTAR 139 Certification of Aerodromes
- OTAR 140 Rescue and Fire-Fighting Services (RFFS) Requirements
- OTAR 145 Aircraft Maintenance Organisation Approval
- OTAR 171 Aeronautical Telecommunications Services
- OTAR 172 Air Traffic Service Organisation Approval
- OTAR 173 Flight Checking Organisation Approval
- OTAR 176 Instrument Flight Procedure Approval

### 3.5 Agreement of Operator or Service Provider’s Safety Performance

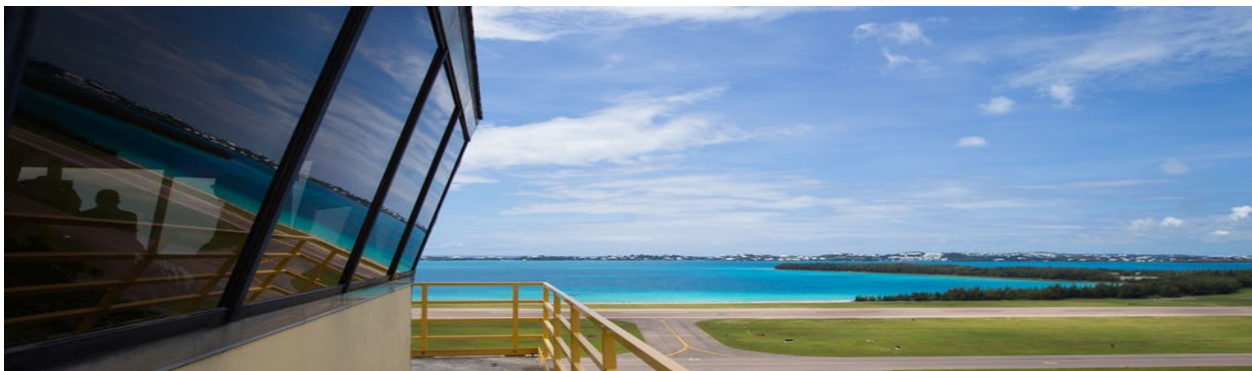
3.5.1 BCAA continuously evolves its processes to collate and evaluate data to assess the safety performance of service providers. This includes reviews across different aviation disciplines related to each service provider using audit findings, ramp checks, any enforcement action history and occurrence reports. International and local incident safety data is regularly reviewed and shared at the SOMSCOM meetings.

3.5.2 BCAA has not, at this time, established acceptable levels of safety for individual service providers. The BCAA Safety Plan can be used by service providers to monitor and measure actions and safety performance. A BCAA SMS assessment will assess service providers’ management of risk and review specific SPIs to ensure the effectiveness of their baseline performance.

### 3.6 Periodic Assessment of the Operator or Service Provider’s SMS

3.6.1 BCAA requires all Part 125 and Part 119 Operators, Option 2 Aircraft Maintenance Organisations (AMOs), Air Navigation Service Providers (ANSPs), and Aerodrome Operators to establish an SMS. BCAA has focused substantial resources on ensuring service providers develop a plan to facilitate effective implementation and/or maintenance of an SMS. This is in the form of BCAA guidance material and SMS assessments.

3.6.2 BCAA continuously reviews the relevance of all guidance material and the assessment tool and amends these to align with ICAO Annex 19 and related guidance material.



Picture 2 – Bermuda Air Traffic Control (ATC) Tower

## Chapter 4 – SSP Component 3 – Bermuda Safety Assurance

### 4.1 Safety Oversight

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

### 4.2 Safety Oversight of Operators and Service Providers

- 4.2.1 Regulatory oversight is conducted through inspections and audits, together with provision of advice and guidance, to ensure that industry meets the appropriate standards. Staff are specialists in the functional area which they regulate, and technical competencies are defined for each role within BCAA.
- 4.2.2 Within some areas, expertise is pooled across the UK OTs via the Pool of Experts (PoE) mechanism. The PoE can be used to provide additional resources for oversight where required. Each expert is sponsored by an OTAA with specified functions, records of competency, scope of expertise and any records of work.
- 4.2.3 Ramp checks of foreign aircraft are conducted by airworthiness and flight operations staff. Although not part of the programme, the ramp checks are based upon the Safety Assessment of Foreign Aircraft (SAFA) process established by EASA.
- 4.2.4 Regulatory nonconformance is subject to corrective action through the raising of findings. An audit may also include observations where there is the potential for non-compliance to develop if no action is taken, or there is an opportunity for safety improvement.
- 4.2.5 BCAA's enforcement procedure provides a structured escalation framework which may, in extreme circumstances, lead to prosecution.

### 4.3 Internal SSP Review/ Quality Assurance

- 4.3.1 The BCAA maintains the SSP in accordance with Annex 19 SARPS and the ICAO Doc 9859 Safety Management Manual. The ICAO SSP gap analysis created the implementation plan that has been the basis of the BCAA's focus and is periodically reviewed. The goals and objectives derived from the plan are regularly assessed and discussed at the annual OTSPC meetings.
- 4.3.2 BCAA has established a Safety & Quality Management Systems Manual (SQMS) which defines how BCAA achieves quality objectives and describes the Authority's quality standards and procedures. The BCAA's internal quality audit schedule is outlined in the manual.
- 4.3.3 Performance indicators of the BCAA are captured in the Safety Plan and reviewed annually. The performance indicators of the BCAA's service providers' activities are reviewed during periodic SMS assessments.

### 4.4 External SSP Review/Audit

- 4.4.1 ASSI conducts assessments of each OTAA as part of a programme which covers approximately a two-year period. The scope and areas assessed depend, to a large extent, on the scale of the responsibilities of the individual OTAA and the scale and complexity of the industry that it regulates. The objective of the audit is to determine whether Bermuda is complying with the United Kingdom's obligations under the Chicago Convention; on the standard of aviation safety



regulation; on the adequacy of the resources employed; and on any remedial measures that may be necessary.

#### **4.5 Safety Data Collection, Analysis and Exchange (Safety Intelligence)**

- 4.5.1 AN(OT)O Article 174 establishes the requirement for mandatory occurrence reporting and OTAR 13 with its associated OTAC provides further detail. The sole objective of occurrence reporting is the prevention of accidents and incidents, not to attribute liability or blame.
- 4.5.2 Mandatory Occurrence Reports (MORs) are currently entered into the BCAA MOR database with the intent of sharing information between OTs. In addition to MORs, there are AAIB reporting arrangements for aircraft accidents and serious incidents which complies with ICAO Annex 13.
- 4.5.3 BCAA receives incident reports from EASA's Safety Assessment of Foreign Aircraft (SAFA) programme which are analysed and tracked for closure by BCAA Safety Inspectors.
- 4.5.4 The BCAA encourages voluntary reporting of incidents via the occurrence reporting process. The process combines all safety/security occurrences, wildlife strikes, dangerous goods, airprox and observations. There is no process differentiation between mandatory and voluntary reports.
- 4.5.5 All occurrence reports are processed and tracked by the SOS until such time as they are closed by the relevant inspector. If an occurrence report of a serious or unusual nature occurs, it will be investigated, and outcomes discussed at SOMSCOM.
- 4.5.6 Periodically BCAA collates, de-identifies and disseminates a selection of occurrences to service providers to raise awareness of hazards and provide feedback and examples of reports made.

#### **4.6 Safety Data-Driven Risk-Based Targeting of Oversight**

- 4.6.1 In order to drive greater improvements in safety, BCAA maintains a risk-based approach to oversight. This approach was initially established for private aircraft inspections and one of the Article 83 bis Operators. It has since been extended to all BCAA's safety oversight programmes. All inspection outputs are reviewed, and the safety risk determined. The annual inspection programme is then developed based on the safety risk.
- 4.6.2 During the monthly SOMSCOM meetings, the following information is discussed:
  - SMS assessments;
  - compliance audits;
  - safety investigations;
  - risk assessments;
  - safety occurrence reports;
  - SAFA reports, and
  - routine oversight information.This information serves as the foundation for the BCAA's risk-based approach.
- 4.6.3 The BCAA reviews the annual safety reports issued by ICAO, IATA and any UK safety data/publications including the AAIB reports along 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.

#### **4.7 Overseas Territories Safety and Performance Council (OTSPC)**

- 4.7. The OT Safety and Performance Council (OTSPC) is a mechanism by which advice and assurance from ASSI and the OTAAs is provided on aviation safety performance. It supplements the SOMSCOM initiatives to manage safety risk in Bermuda.



*Picture 3 – Bermuda registered aircraft on the ramp in Bermuda.*

## Chapter 5 – SSP Component 4 – Bermuda Safety Promotion

### 5.1 Internal Training

- 5.1.1 BCAA staff positions are assessed for required levels of competency and knowledge. For new people joining the BCAA, competency gaps are identified on induction and then addressed via appropriate development and training plans. These are then regularly reassessed and addressed through staff performance assessments. The staff induction process covers an overview of all areas including the SSP. All BCAA staff complete biennial Human Factors (HF) training and additionally, all technical staff complete annual SMS training. Current projects aim to improve industry engagement with continued SSP developments.

### 5.2 Internal Communication and Dissemination of Safety Information

- 5.2.1 Internal safety information is communicated via many forums amongst the BCAA team however, SOMSCOM is the primary platform for the sharing of safety data. Monthly SOMSCOM minutes are provided to all staff and ASSI.
- 5.2.2 Monthly BCAA staff meetings provide opportunities to educate and update staff on the progress and changes within the SSP, SQMS and safety promotion information. Safety training events are facilitated through the BCAA Safety Oversight Section along with webinars and workshops hosted by ASSI.

### 5.3 External Training

- 5.3.1 BCAA supports the regular training events and webinars provided by ASSI and participates in relevant regional training initiatives. The BCAA Safety Plan describes in more detail the Bermuda safety objectives and outlines the programme of work to achieve continuous safety improvement over the years to come.
- 5.3.2 BCAA delivers HF and SMS training to local stakeholders as needed, aiming to enhance understanding and foster relationships.

### 5.4 External Communication and Dissemination of Safety Information

- 5.4.1 BCAA communicates with stakeholders via its website, Facebook page, LinkedIn account and safety bulletins which convey safety information. BCAA operates an e-mail alert system to which service providers can sign up to be advised of the availability of new or updated material.
- 5.4.2 BCAA has plans to organize an SSP conference to interact directly with local stakeholders.
- 5.4.3 BCAA is currently an Observer of the Safety Management International Collaboration Group (SMICG) with plans to become a member in 2024. The SMICG is a joint cooperation between many regulatory authorities for the purpose of promoting a common understanding of safety management and Safety Management System (SMS)/State Safety Program (SSP) principles and requirements, facilitating their implementation across the international aviation community.

Chapter 6 – Summary

6.1 Summary

- 6.1 BCAA is committed to effectively managing its State Safety Programme. This is a live document and is periodically updated. The gaps identified within the ICAO SSP Gap Analysis are either underway or planned for the future.
- 6.2 BCAA welcomes any questions, contributions or comments at: [info@bcaa.bm](mailto:info@bcaa.bm).
- 6.3 For further information on the BCAA please visit the website at: [www.bcaa.bm](http://www.bcaa.bm).

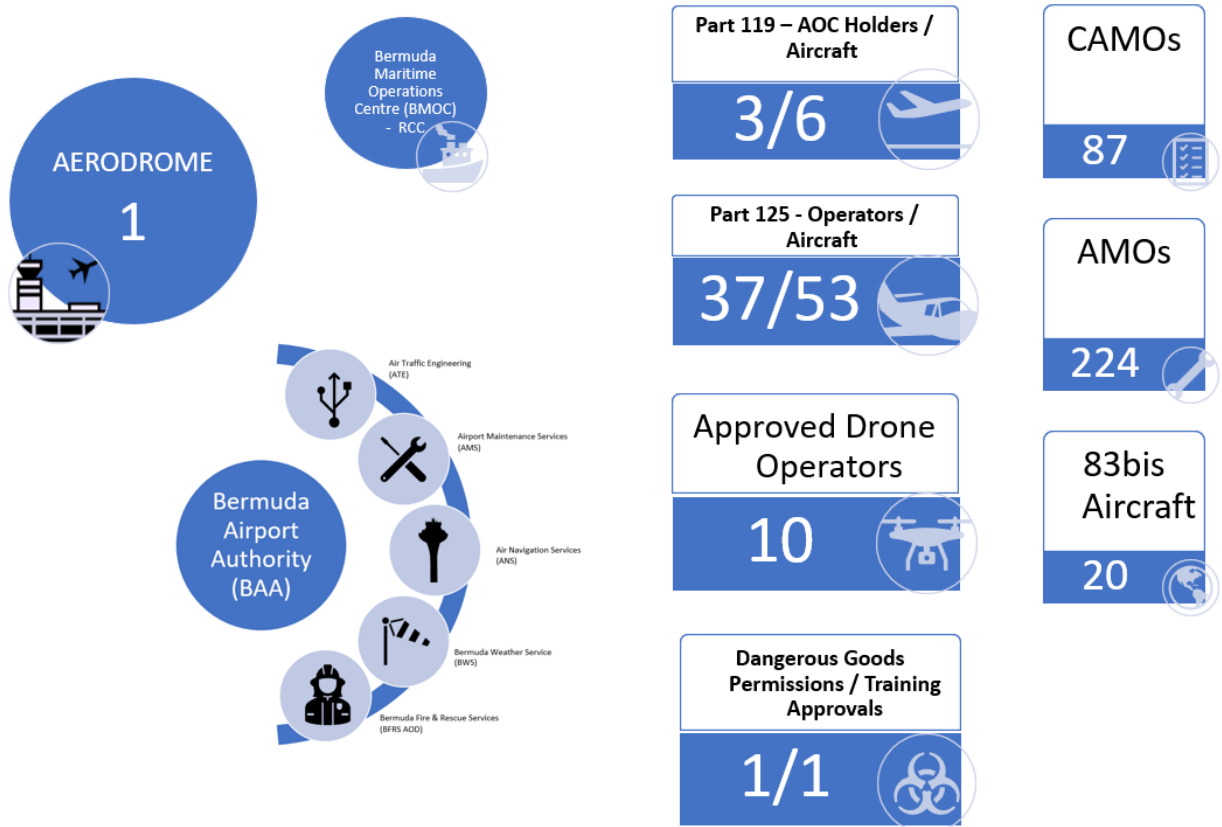


Figure 3 - Bermuda safety oversight as of 26 October 2023.

## Appendix A

### **BCAA Safety and Quality Policy**

The Bermuda Civil Aviation Authority (BCAA) actively promotes aviation safety within Bermuda's civil aviation industry with the assurance of quality being fundamental to all aspects of our operations. We are committed to developing and implementing sound aviation regulations, procedures and standards to ensure aviation activities regulated by the authority achieve the highest practicable level of safety performance and quality assurance.

To this end, the BCAA will:

1. Comply with all applicable laws and regulations as well as internal requirements.
2. Ensure a healthy and safe workplace for all BCAA employees.
3. Ensure BCAA staff have the skills, expertise and resources needed to carry out their safety oversight and management responsibilities.
4. Deliver a sound regulatory programme that meets Bermuda's obligations to international safety standards.
5. Foster safety reporting and promote a just culture; where personnel are aware of the different circumstances surrounding unintentional errors and wilful negligence, through ASSI policy 47 policies and BCAA enforcement procedure.
6. Implement an effective, performance-based safety oversight programme that addresses the diverse needs of Bermuda's aviation industry and adopt a risk-based approach to address areas of greater safety concern.
7. Identify safety trends within the aviation industry to learn and benefit from our experiences and the experiences of others.
8. Develop safety performance indicators to continuously monitor and measure the safety performance of the BCAA's Safety Oversight Management System.
9. Consult and collaborate with Air Safety Support International (ASSI) and other Overseas Territories to address safety and regulatory matters to enhance aviation safety.
10. Encourage participation and promotion of quality and safety responsibilities of all employees.

*Original safety policy signed by the Director General (BCAA Accountable Manager).*