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Be Honest With Your Gap Analysis!

One of the most important aspects of laying the foundation of a Safety Management System (SMS) is the Gap analysis. The Gap analysis is simply an audit-type checklist that allows the auditor to determine what elements of the SMS are already in place and what elements need to be implemented. It should be kept in mind, however, that it's not always as simple as Yes or No answers; an in depth Gap analysis will be scalable to account for various levels of a particular element's implementation or progress.

A Gap analysis is not a one-shot deal. It will become a living document which will need to be updated on a regular basis, especially during the SMS implementation phase. Later, the Gap analysis can, and should, be used as an audit tool for your functional SMS.

If a Gap analysis (especially the first one) is conducted internally, there is a major issue that might be encountered (and I have observed). A lack of objectivity and neutrality combined with a dose of bias may cause your internal Gap analysis to lack honesty and not be truly representative of the status of your company's current SMS. And bias may be present where the responses to the questions are overly optimistic because the auditor wants to "believe (or hope) that those elements are in place" when in fact they are not!

The lesson to be learned here is that if the Gap analysis (especially the first one) is to be conducted internally, you need to ensure that the person (or people) conducting the analysis are

being open, objective, and unbiased when responding to the Gap questions. Otherwise, I can guarantee you that there will be inconsistencies and much frustration later on when your SMS is audited by an outside organization (such as your CAA)!