

Integrating an EASA Compliant Aviation Security Management into the Organization's Safety Management System

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Introduction

The integration of an EASA-compliant Aviation Security Management System (SeMS) within an organization's Safety Management System (SMS) offers significant benefits but also presents certain challenges. This article explores the merits of combining these systems to address both safety and security effectively.

Benefits of Integration

Combining an EASA-compliant SeMS with an SMS can enhance efficiency, communication, and regulatory compliance. This integrated approach, however, requires careful planning and resource allocation to manage added complexities. For smaller organizations, maintaining standalone systems may be more practical.

Key Advantages:

- **Enhanced Communication:** Integrated systems foster better communication between safety and security teams, ensuring that both types of threats are addressed collaboratively.
- **Streamlined Processes:** Reduces duplication of efforts, leading to more efficient operations and better resource utilization.
- **Comprehensive Risk Management:** Addresses all potential threats, ensuring a unified approach to risk management and enhancing overall safety and security.
- **Regulatory Compliance:** Simplifies compliance with safety and security regulations, providing a single reference point for audits and inspections.
- **Consistent Policies and Procedures:** Ensures that safety and security policies are consistently applied across the organization, leading to more predictable and reliable outcomes.

Key Challenges:

- **Increased Complexity:** Integration adds complexity, requiring significant management and resource investment to ensure both safety and security aspects are adequately addressed.
- **Balancing Priorities:** Ensuring that neither safety nor security aspects overshadow the other, maintaining a balanced focus on both areas.
- **Resource Allocation:** Requires significant investment in terms of time, training, and possibly new technology to ensure seamless integration.

Regulatory Framework and Compliance

Safety Management System (SMS)

- Under EASA regulations, an SMS is a systematic approach to managing safety, including organizational structures, accountabilities, policies, and procedures. Detailed in Regulation (EU) No 965/2012 for air operations, the SMS encompasses:
 - Safety Policy and Objectives: Clear commitment to safety and specific safety goals that reflect the organization's dedication to safety performance.
 - Accountable Manager and Safety Manager: Individuals responsible for ensuring safety policies are followed and managing the implementation, maintenance, and continuous improvement of the SMS.
 - Safety Risk Management: Processes for hazard identification, risk assessment, and risk mitigation, ensuring proactive management of safety risks.
 - Safety Assurance: Monitoring and improving safety performance through continuous performance measurement, management of change, and continuous improvement mechanisms.
 - Safety Promotion: Training, education, and communication initiatives to foster a positive safety culture within the organization.
 - Documentation and Record-Keeping: Comprehensive documentation of the SMS, including safety policies, procedures, performance indicators, and records of safety-related activities.
 - Emergency Response Planning: Preparedness for various emergencies, integrating local and national agencies to ensure coordinated response.
 - Regulatory Compliance: Adherence to EASA regulations, including cooperation during audits and inspections, and timely reporting of safety-related information.
 - Stakeholder Engagement: Involving both internal and external stakeholders in safety management processes to enhance overall safety performance.
 - Performance Review: Regular internal audits and management reviews to assess the effectiveness and relevance of the SMS.

Security Management System (SeMS)

- EASA mandates security measures under Regulation (EC) No 300/2008, establishing common rules for civil aviation security. The SeMS includes:
 - Development and Maintenance of Security Programs: Complying with both EU and national security standards, describing methods and procedures to ensure security compliance.
 - Screening and Protection: Ensuring the security of passengers, baggage, and cargo through thorough screening and protection measures.
 - In-Flight Security: Measures to prevent unauthorized access to the flight crew compartment and handle potentially disruptive passengers.

- Mail and Cargo Security: Applying security controls to mail and cargo to prevent unauthorized interference.
- Training and Certification: Ensuring personnel involved in security controls are properly recruited, trained, and certified to perform their duties effectively.
- Security Equipment: Using compliant equipment for screening, access control, and other security measures to perform required security functions.
- Compliance and Monitoring: Regular audits and inspections to ensure adherence to security standards and rectification of identified deficiencies.
- Security Programs: Developing security programs for airport operators, air carriers, and entities implementing aviation security standards, including internal quality control provisions.
- Cooperation and Information Sharing: Promoting agreements recognizing third-country security standards equivalent to EU standards and establishing a Stakeholders' Advisory Group on Aviation Security.
- Penalties and Enforcement: Establishing penalties for infringements and ensuring they are effective, proportionate, and dissuasive.

Integration Strategy

Joint Training and Awareness Programs

- Develop training programs that enhance staff awareness about the interdependencies between safety and security. Promote an integrated approach to risk management through shared learning experiences, ensuring all personnel are equipped to handle both safety and security aspects.

Harmonized Standard Operating Procedures (SOPs)

- Align SOPs to address both safety and security issues, minimizing risks. For instance, procedures for handling dangerous goods should consider both safety regulations and security screening requirements to ensure comprehensive risk management.

Integrated Emergency Response Plans

- Ensure that emergency response plans cover both safety and security aspects. A coordinated response is crucial for incidents with dual implications, ensuring that both safety and security teams are prepared to work together during emergencies.

Unified Risk Assessment

- Create a risk assessment process that includes both safety and security risks. Maintain a combined risk register to track, monitor, and review risks

comprehensively. This unified approach ensures that mitigation strategies consider both safety and security aspects.

Regulatory Compliance and Performance Monitoring

- Conduct joint audits to identify gaps and ensure comprehensive compliance with both safety and security regulations.
- Use integrated dashboards to monitor key performance indicators (KPIs) for a holistic view of organizational performance, ensuring continuous improvement in both areas.

Incident Reporting and Investigation

- Develop robust incident reporting and investigation mechanisms that address both safety and security incidents.
- Coordination ensures that incidents with dual implications are thoroughly investigated, and corrective actions are implemented comprehensively.

Advantages and Disadvantages of Integration

Advantages:

- **Comprehensive Approach:** Addresses risks in a unified manner, ensuring all potential threats are considered in conjunction.
- **Resource Efficiency:** Reduces duplication of efforts, leading to streamlined processes and better resource utilization.
- **Enhanced Communication:** Fosters better communication and collaboration between safety and security teams, leading to more coordinated responses to incidents.
- **Simplified Compliance:** Easier to demonstrate compliance with both safety and security regulations, as integrated systems provide a single point of reference.
- **Consistent Application:** Ensures consistent application of policies and procedures across both safety and security domains, leading to more predictable and reliable outcomes.

Disadvantages:

- **Increased Complexity:** Integration adds complexity to the system, requiring significant initial effort and ongoing management to ensure both safety and security aspects are adequately addressed.
- **Significant Investment:** Requires significant investment in terms of time, training, and possibly new technology to ensure seamless integration.
- **Balancing Priorities:** If not managed properly, there could be a risk of security aspects being overshadowed by safety priorities, or vice versa.

Developing an Integrated Risk Management Framework

Unified Risk Assessment Process

- Develop a unified risk assessment process that includes both safety and security risk assessments.
- This involves identifying potential hazards and threats, analyzing their likelihood and impact, and implementing appropriate mitigation measures to address both safety and security concerns.

Combined Risk Register

- Maintain a combined risk register that documents both safety and security risks. This helps in tracking, monitoring, and reviewing risks in an integrated manner, ensuring that mitigation strategies consider both aspects and providing a comprehensive view of organizational risks.

Harmonized Policies and Procedures

- Develop and implement harmonized policies that address both safety and security. For example, a policy on incident reporting should cover procedures for reporting both safety incidents and security breaches.
- Revise existing SOPs to include security considerations alongside safety measures.

Integrated Training Programs

- Design and deliver integrated training programs that cover both safety and security awareness. This ensures that personnel are aware of the interdependencies and are equipped to manage both types of risks effectively. Regular assessments and refresher training can help maintain high levels of competency across the organization.

Joint Incident Response Plans

- Develop joint incident response plans that address both safety and security scenarios. This ensures a coordinated response to incidents that may have both safety and security implications. Conduct integrated investigations for such incidents to identify root causes and implement comprehensive corrective actions.

Conclusion

- Integrating an EASA-compliant Aviation Safety Management System (SMS) with a Security Management System (SeMS) ensures a comprehensive approach to managing risks in aviation.
- By aligning processes, enhancing communication, and fostering a culture that values both safety and security, organizations can better protect their operations, passengers, and assets.

- This holistic approach not only ensures regulatory compliance but also enhances the overall resilience and robustness of the aviation system.

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