

Information Security Risk Register: Potential Issues - Integrated Operator

1. Unauthorized Access to Operational Systems

Inadequate access controls leading to exposure of Departure Control System (DCS), Load Control, or Baggage Reconciliation System BRS platforms to unauthorized or under-trained staff.

2. Credential Compromise via Phishing or Spoofing

Spoofed login portals or social engineering enabling credential harvesting, particularly in check-in and dispatch environments.

3. Unsecured Mobile Devices on Untrusted Networks

Tablets used for remote boarding or ramp operations connecting via open Wi-Fi, enabling MitM attacks. - A Man-in-the-Middle (MitM) attack is a cyberattack where a malicious actor secretly intercepts and possibly alters the communication between two parties who believe they are directly communicating with each other.

4. Data Integrity Failures in Load Control Systems

Altered weight and balance data due to software bugs, insider manipulation, or malware intrusion.

5. Inadequate MFA Enforcement Across Platforms

Absence or inconsistent application of Multi-Factor Authentication (MFA) on terminals, handhelds, or admin portals.

6. System Downtime Impacting Critical Functions

Outages in Cargo Management System - CMS, BRS, or W&B tools leading to ground delays, mishandling, or compromised safety margins.

7. Failure to Revoke Access Post-Contract Termination

Dormant user accounts left active after staff departure or contractor disengagement, posing privilege escalation risks.

8. Human Error in Data Entry or Manual Overrides

Ramp or check-in staff inputting incorrect data (e.g. ULD weights, baggage tags), bypassing system checks.

9. Legacy Systems with Weak or No Encryption

Baggage systems, kiosks, or dispatch software using outdated protocols for data transmission.

10. Insecure Data Exchange with Third Parties

Contractors (e.g. catering, ground handling) transmitting provisioning or manifest data over unencrypted channels.

11. Insider Threat from Over-Permissioned Staff

Access privileges not aligned with operational need (e.g. admin-level access to junior baggage staff).

12. Loss or Theft of Physical Devices

Handheld scanners or tablets misplaced during shift change, storing unencrypted PNR or baggage data.

13. Supply Chain Risk from Non-Compliant Vendors

Third-party systems (CMS, catering) introducing vulnerabilities due to poor patching or non-certification.

14. Spoofed or Manipulated Service Requests

Unauthenticated commands issued to fueling, pushback, or cleaning dispatch systems.

15. Malware Introduction via USB or Shared Workstations

Removable media used by external vendors infecting central operational systems.

16. Unsegmented Networks Between Departments

Shared infrastructure between AMO, CAMO, Ops, and Security exposing cross-domain vulnerabilities.

17. Inaccurate or Conflicting Load Sheet Versions

Lack of version control leading to misaligned data across OFP, dispatch, and load control systems.

18. Compromised CCTV and Monitoring Terminals

Unauthorized access to or recording of CCTV feeds showing operational movements or personnel.

19. Improper Disposal of Confidential Physical Records

Load sheets, rosters, or customs documents discarded without shredding or locked storage.

20. Delayed Revocation of Physical Access Credentials

ID badges or vehicle keys active after shift changes or access right updates not synchronized.

21. Compromised Customs Interface or DG Documentation

Intercepted or altered cargo declarations between CMS and customs portals.

22. Cross-Contamination Between Secure & Non-Secure Devices

Shared devices between secure (e.g., customs, load planning) and non-secure (e.g., service logs) applications.

23. Failure to Classify and Prioritize Critical Assets

Lack of clear identification of mission-critical assets such as W&B tools, DCS, or OFP platforms.

24. Inadequate Incident Detection and Response Maturity

No active monitoring or playbooks for ransomware, credential misuse, or system denial events.

25. Non-Conformance with IS.I.OR Requirements (203/2023)

Missing controls for incident classification, asset documentation, or stakeholder mapping per regulation.

26. Data Loss from Improper Offline Synchronization

Scanner or tablet events not uploading post-network outage, leading to reconciliation errors.

27. Lack of Formal Vendor Security Governance

Absence of SLAs, audits, or compliance clauses for third-party contractors with system access.

28. Training Gaps in Role-Specific ISMS Procedures

Staff unaware of phishing, device usage, or response protocols due to infrequent or untargeted training.

29. Insecure Hard Copy Documentation Practices

Open access to printouts of sensitive reports, shift rosters, or incident logs.

30. Failure to Maintain ISMS Documentation & Evidence

Incomplete ISMS logs, incident records, or audit evidence undermining compliance and response capability.

31. Weak User Passwords in CAMO Planning System

32. Insecure Email Transfer of Work Packages

Use of email for PDF sharing

33. Unauthorized AMO Access to AMP Tables

Misconfigured access roles

34. Legacy EFB App with Known Vulnerabilities

Unpatched mobile app

35. Incomplete Backup of Technical Records

Manual backup routine

36. Generic Login Accounts Shared Among Staff

Lack of individual accountability

37. Phishing Risk to CAMO Admin Staff

Social engineering

38. Contractors Retaining System Access Post-Project

Failure to deactivate accounts

39. Insecure Wi-Fi Used by Line Maintenance Staff

Personal or public networks

40. Missing Security Patches on CAMO Workstations

Irregular patching schedule

41. No Audit Trail on MEL Status Updates

System lacks logging

42. Data Leakage from Uncontrolled USB Ports

No USB restriction policy

43. Third-Party AMO Connects via Untrusted Network

Insecure remote access

44. No Centralised Logging for CAMO–OCC Data Exchange

Fragmented tools

45. Lack of Data Classification Policy

Absence of asset tagging

46. Technical Records Stored on Non-Encrypted Drives

Insecure storage

47. Uncontrolled Use of File-Sharing Apps (e.g., WeTransfer)

Shadow IT

48. No Business Continuity Plan for CAMO IT Systems

BCP not established

49. Excessive Access Privileges for Temporary Staff

Temporary or contract CAMO personnel assigned permanent system

50. Unmonitored Use of Portable Maintenance Devices

Tablets/laptops used for remote aircraft defect entry not centrally monitored

51. Technical Log Copies Circulated as Unprotected PDFs

Exported PDFs shared across departments without encryption

52. Lack of Alerting on Critical System Changes

No notification when AMP tasks, MEL entries, or deferred defects are changed

53. Third-Party Cloud Hosting Without Formal DPA or SLA

Use of cloud-based CAMO planning module with no signed Data Processing Agreement (DPA) or Service Level Agreement (SLA)

54. Absence of a Defined Incident Response Process

CAMO staff unsure how to report or escalate cyber incidents

55. Shared EFB Login Credentials for MEL Management

Crew use common credentials to access MEL updates during flight

56. CAMO Risk Register Not Integrated with SMS System

Cyber risks and ISMS risks not reflected in enterprise-wide safety system

57. Aircraft Software Revisions Not Version-Controlled

CAMO lacks visibility of software configurations and patches installed by AMO

58. CAMO Asset Inventory Incomplete or Outdated

No validated record of laptops, mobile devices, software tools in CAMO use

59. Hardware: Server downtime, loss of asset control, AOG data station vulnerabilities

Malware infection, misconfigured work order systems, version mismatch, People: Social engineering, accidental data disclosure, competence gaps, Poor access control, shared network breaches, loss of audit trail

60. Server Downtime During Peak Planning Periods

maintenance scheduling system hosted on a local server becomes unavailable during a heavy aircraft maintenance period.

61. Impact: Risk of data theft or loss following physical theft.

62. AOG Support Device Exposure at Remote Stations

63. Malware Infection via Infected Maintenance USBs

AMO personnel introduce malware into CAMO systems by using removable drives during a maintenance event.

64. Human factors—including intentional or unintentional behavior by employees, contractors, or third parties—pose significant exposure in CAMO operations.

Social Engineering Attack on CAMO Planning Staff

65. CAMO team members lack training in proper use of data classification, secure communication, or incident reporting.

Misuse of systems, unreported breaches.

66. Poor Access Control Policies Across Shared Systems

AMO users retain access to CAMO planning modules after project completion.

67. A malware infection in an AMO maintenance kiosk propagates to CAMO systems through an inadequately segmented network.

Compromise of airworthiness management applications.

68. Delayed Board-Level Threat Awareness

Cyber incidents not escalated promptly, undermining strategic BCP decisions.

69. Use of Shadow IT by Executives – Unauthorized apps/devices bypass enterprise controls during crises.

70. Fragmented Incident Playbooks – Inconsistent or outdated departmental BCP guidance results in uneven recovery.

71. Lack of Policy Harmonization Across Units – Incoherent application of ISMS–BCP directives increases regulatory exposure.

72. Third-Party Non-Conformance – Suppliers fail to meet ISMS-related BCP controls (e.g., CRM or EFB vendors).

73. Operational Continuity Risks (OCC, Dispatch, Flight Ops)

74. Maintenance & Airworthiness Systems

Tampering with Deferred Defect Data – Alters MEL/CDL logs, compromising airworthiness.

75. DDoS Against Booking/Check-in Portals – Impacts brand reputation and revenue during peaks.

76. CRM Exploitation – Loyalty or payment data stolen due to third-party API weakness.

77. Safety Reporting System Downtime –

Obstructs timely SMS hazard communication and incident escalation.

78. Central IT Compromise (APT/Firmware) – Impacts PSS, OCC, and Maintenance via domain controller or firmware attack.

79. Power Loss Without Proper Failover –

Single-point outage disables primary systems without effective failover.

80. Delayed Incident Escalation –

Incorrect severity classification delays BCP activation.

81. Unvalidated or Outdated Playbooks –

Procedures reference obsolete systems or roles.

82. Inadequate Cross-Role Training –

Leads to execution failure during real events (e.g., crew briefings or system recovery).

83. **Non-Translated Lessons from Simulation Exercises** – Findings not reflected in ISMS–BCP updates or procurement.

84. **Inactive user accounts exploited for credential-based attacks.**

85. **Shared logins on line station workstations undermining traceability.**

86. **Role creep: escalation of privileges without governance.**

87. **MFA bypass or failure leading to unauthorised remote access.**

88. **VPN access granted to subcontractors using unsecured personal devices.**

89. **Inadequate cyber hygiene of external AMOs causing interface vulnerabilities.**

90. **Use of public cloud storage for maintenance data without encryption.**

91. **Badge cloning or unauthorized access to tool cribs or server rooms.**

92. **Engineers unaware of phishing/social engineering tactics.**

93. **Staff bypassing secure portals for task access due to usability constraints.**

94. **ISMS Policy Misalignment –**

ISMS objectives not aligned with organizational security strategy leading to inconsistent implementation.

95. **Incomplete Asset Inventory –**

Unidentified or unclassified digital/physical assets expose the system to unmanaged vulnerabilities.

96. **Lack of Role-Based Accountability**

Undefined responsibilities across Security, CAMO, APOPS, or Cybersecurity cause delayed responses or control failures.

97. **Insider Threat & Human Factors**

Malicious Insider Activity – Credentialed personnel misusing access for sabotage, data leakage, or theft.

98. **Negligent Insider Exposure –**

Staff unintentionally exposing credentials, misconfiguring systems, or failing to report anomalies.

99. **Unauthorized Information Disclosure –**

Internal sharing of restricted intelligence or surveillance data violating CIA principles.

100. Training Deficiency –

Inadequate understanding of cyber hygiene, technology use, or incident response procedures.

101. Physical Security Risks

Perimeter Breach – Unauthorized entry via fence breach, gate compromise, or unmonitored emergency exits.

102. Failure of Surveillance Systems

Downtime or data loss in CCTV coverage due to hardware failure or power outages.

103. Credential Theft via Phishing

Social engineering or malicious links used to capture login credentials.

104. Access Control System Breach – Unauthorized digital access to badge database or reader configuration.

105. Denial of Service (DoS) on Access Systems –

System overload affecting badge swipe validation and area lockdowns.

106. Uncontrolled Third-Party Access – Contractors or vendors accessing restricted areas without escort or proper credentialing.

107. Delayed Revocation of Access – Ex-employees or reassigned staff retaining valid credentials.

108. Cargo Tampering or Substitution

Unauthorized items placed in ULDs or manifest substitution.

109. Failure of Chain-of-Custody – Break in RFID/GPS tracking, leading to loss of location traceability.

110. Lack of Enhanced Checks for High-Risk Cargo

Inadequate profiling of origin or consignor history.

111. Delayed Incident Reporting –

Frontline staff unaware or hesitant to report anomalies.

112. Inadequate Severity Classification –

Underestimating impact leading to poor escalation and resource allocation.

113. Recovery Plan Failures

Poor testing of backup systems or unclear recovery protocols during access control failure.

Compliance & Strategic Risks

114. Backup System Failure –

Communication blackout during outages due to untested or degraded UPS systems.

115. Cloud Provider Outage –

Unavailability of third-party OFP tools due to cloud downtime, disrupting dispatch operations.

116. Supply Chain Cyber Weakness –

Third-party software or VPN platforms becoming vectors for malware or unauthorized access.

117. SLAs Not Enforced – Service delivery or availability issues not captured in supplier agreements

118. Social Engineering Attacks on Dispatchers –

Manipulative techniques used to extract credentials or authorize bad actors.

119. Training Deficiencies in Incident Handling – Inadequate preparedness for ransomware or data breach recovery.

120. Non-Conformity with Regulation (EU) 2023/203 –

Incomplete implementation of AMC1 IS.I.OR.200(e) leading to compliance gaps.

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