



Framework for an Aviation Security Management System (SeMS)



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Contents

Definitions		1
Introduction		2
	Purpose	2
	Implementation	2
	SeMS philosophy	3
	Key components of a SeMS	3
	Further guidance	4
Chapter 1	Management commitment	5
	Senior management commitment	5
	Security policy statement	5
	Key appointments	6
	Accountable Manager	6
	Security Manager	7
Chapter 2	Threat and risk management	8
	Local threat identification process	8
	Assessing vulnerabilities	9
	Assessing risks	9
	Review process	10
Chapter 3	Accountability & responsibilities	11
	Defined accountability and responsibilities	11
	Security governance mechanisms	11
Chapter 4	Resources	13
	Provision of resources, facilities, equipment and supporting services	13
	Personnel competences for the SeMS	14
	Management of third party suppliers	14
	Receiving third party services	14
	Providing third party services	14

Chapter 5	Performance monitoring, assessment & reporting	15
	Performance monitoring and measurement process	15
	Analysis of data	16
	Corrective action	16
	Preventive action	16
	Management of security data and information	17
	Security reporting system	17
	Record keeping	18
	Quality assurance of data and information	18
Chapter 6	Incident response	19
	Incident response	19
	Incident response process	20
Chapter 7	Management of change	21
	General principles	21
	The management of change	21
Chapter 8	Continuous improvement	22
	Continuous improvement	22
	Sharing of information	23
Chapter 9	SeMS education and security culture	24
	Aims and scope of SeMS education	24
	SeMS education programme for the Entity's personnel	24
	A. Operational personnel	24
	B. Managers and supervisors	25
	C. Senior managers	25
	D. Accountable Manager	25
Chapter 10	Communication	26
	Security communication	26
	Communication tools	26

Definitions

Accountable Manager – The Accountable Manager is the senior person within the Entity who is ultimately responsible and accountable for the delivery of security within that Entity. The role is described in more detail in Chapter 1 of this document.

Aviation Security Requirements – Aviation Security Requirements is a reference to the EU aviation security common basic standards and the more stringent measures applied in the UK.

Entity – The Entity is the Airport Operator, Air Carrier, Regulated Agent, In Flight Supplier which owns the SeMS.

Relevant Personnel – Where in this document reference is made to Aviation Security Requirements, the Entity should specify, within its SeMS, who the relevant personnel are in each context.

Security Manager – The Security Manager is the subject matter expert whom the Accountable Manager directs to implement and maintain the SeMS and then who uses the SeMS to provide assurance to the Entity.

SeMS – A SeMS is an organised approach to managing security. It is a systematic, precise and proactive process for assesing and managing security risks. As with all management systems, a SeMS provides for goal setting, planning and measuring performance.

SeMS Manual – A SeMS Manual is a manual, or a collection of existing materials, or a combination of both, which describes how the Entity will deliver its SeMS.

SeMS Education – SeMS Education is a reference to education undertaken by personnel to enable the Entity to operate an effective SeMS, to embed a security culture and to any additional training identified by the Entity to deliver its security processes.

Introduction

- 1. The philosophy of SeMS is a top-to-bottom culture that leads to the efficient provision of a secure operation.
- 2. In order for a SeMS to be effective it should have the components described in this framework.

Note: This revision of the SeMS Framework builds on experience gained since the operational launch of SeMS and incorporates Key Points advice for Entities.

Purpose

SeMS provides a formalised, risk-driven framework for integrating security into the daily operations and culture of an Entity. The SeMS enables an Entity to identify and address security risks, threats, gaps and weaknesses in a consistent and proactive way. SeMS is not a mandated process but if an Entity has a SeMS which contains all the elements which are identified in this framework, it will help the Entity to meet the internal quality control provisions of articles 12, 13 and 14 of EC 300/2008¹.

Implementation

A SeMS Manual need not be a separate document. Many of the components will already exist in an Entity's security programme, operational processes, operating procedures or other documents. In order to have a security management system, an Entity only needs to include in its SeMS Manual an index or map of its existing documents, systems and records provided the latter meet the requirements of this Framework.

Depending on its size and complexity, an Entity may decide to combine its security policy, security programme and SeMS Manual into a single document or to keep them separate as complementary documents. It is recognised that SMS and SeMS are closely aligned and can run in parallel.

Whatever form the SeMS Manual may take the SeMS itself should be part of the Entity's overall management system.

SeMS philosophy

The philosophy of SeMS is a top-to-bottom culture that leads to the efficient provision of a secure operation.

In order for a SeMS to be effective (for both industry and the CAA) it should include the components set out in this document.

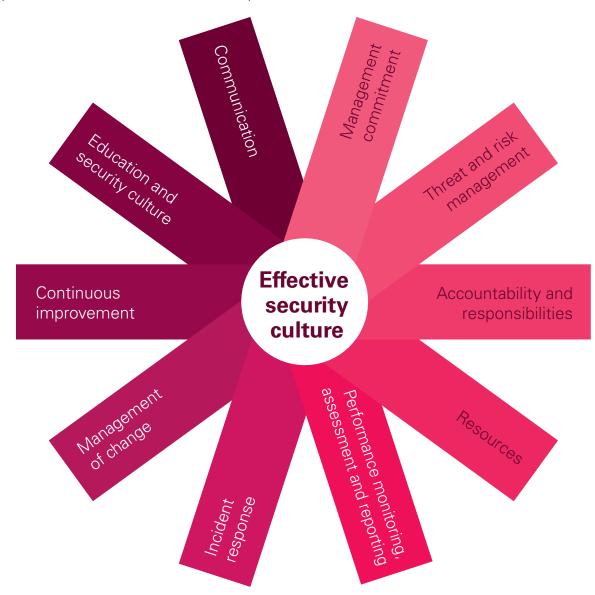
¹ Regulation (EC) 300/2008 of the European Parliament and of the Council of 11 March 2008

Key components of a SeMS

A SeMS should include the following key components, applicable to all types and sizes of Aviation Entity:

- 1. Management commitment
- 2. Threat & risk management
- 3. Accountability & responsibilities
- 4. Resources
- 5. Performance monitoring, assessment & reporting
- 6. Incident response
- 7. Management of change
- 8. Continuous improvement
- 9. Education and security culture
- 10. Communication

Chapters 1 to 10 cover each of these components in turn.



Further guidance

The following publications provide further assistance in how to develop a SeMS.

Guidance for Accountable Managers:

https://www.caa.co.uk/cap1224

Implementing a SeMS:

https://www.caa.co.uk/cap1273

Key points

- 1. Treat SeMS as a project and ensure governance and resource is allocated to see it through.
- 2. There is no need to recast existing documents, procedures, etc. if they support a SeMS. The brigading of security material into one manual has advantages, provided clear cross-referencing is applied.
- 3. The creation of an embedded security culture, akin to that for safety, is a core driver for a SeMS.
- 4. Collection, analysis and use of honest and accurate data is essential.



Management commitment

The Entity's management should show its commitment to security by:

- 1. Board-level and senior management support of the SeMS
- 2. Promoting a positive security culture
- 3. Key appointments that reflect the importance of the SeMS
- 4. Determining and providing the appropriate resources

Senior management commitment

Senior management should:

- promote the Entity's security policy and security culture to all personnel and demonstrate their commitment to it;
- establish the Entity's security objectives and performance standards; and
- determine and provide the necessary human and financial resources for the SeMS.

Security policy statement

The security policy is the means whereby the Entity states its intention to maintain and, where practicable, improve security levels in all its activities.

The security policy should:

- be endorsed by the Accountable Manager;
- identify security as a high organisational priority mutually supportive of commercial and operational priorities;
- reflect organisational commitments regarding security and the Entity's proactive and systematic management;
- be communicated throughout the Entity;
- include security reporting principles;
- be periodically reviewed to remain relevant and appropriate to the Entity;
- include a commitment to:
 - a) a continuous improvement programme;
 - b) ensure Aviation Security Requirements and all applicable standards are met, and consider best practices;
 - c) provide appropriate resources;
 - d) enforce security as the responsibility of all personnel;

- include security reporting procedures (including access to the Anti-Terrorist hotline) and whistleblowing arrangements; and
- promote a positive and embedded security culture.

Key appointments

The Entity's management should ensure the following key roles are filled with suitably qualified and skilled individuals.

Accountable Manager

The Accountable Manager's role is to instil security as a core organisational value and to ensure that the security management system is properly implemented and maintained through the allocation of resources and tasks.

The Accountable Manager may have more than one function in the Entity but should have sufficient authority to be able to direct both finance and resource to the security operation.

The Accountable Manager should be the Chief Executive Officer (CEO) of the Entity or a suitably competent and qualified person appointed by the CEO, taking into account the size, structure and complexity of the Entity.

The Accountable Manager should have a thorough knowledge and understanding of the key issues of risk management within the Entity.

The Accountable Manager's technical knowledge and understanding of SeMS should be sufficient to perform the Accountable Manager role. The Accountable Manager need not know about all the detail of security processes within the Entity, but should have an understanding of how the Entity's assurance of the regime is maintained.

Depending on the size and complexity of operations, the Accountable Manager may delegate specified tasks. However, accountability and responsibility for those tasks remains with the Accountable Manager.

More details on the role of the Accountable Manager can be found within CAP 1224 - Guidance Notes for Accountable Managers (https://www.caa.co.uk/cap1224).

Security Manager

The Security Manager should be the focal point for SeMS and should be tasked with managing the development, administration, and maintenance of an effective security management system.

The Security Manager should:

- facilitate threat identification, risk analysis, and risk management;
- monitor the implementation and functioning of the security management system, including any security actions that the Entity considers necessary;
- manage the security reporting system of the Entity;
- provide assurance reports on security performance to the Entity's Accountable Manager and Board;
- ensure maintenance of security management documentation;
- ensure that security management training that the Entity considers necessary to implement its security operation and its SeMS, is available;
- provide advice on security matters to the Entity; and
- participate in internal occurrence/security investigations.

The Security Manager should have:

- practical experience of, and expertise in, the Entity's operations;
- knowledge of security and quality management;
- knowledge of the Entity's security programme; and
- comprehensive knowledge of the Aviation Security Requirements applicable to the Entity.

The Security Manager may be any suitably competent and qualified person at appropriate management level, provided that that person can act independently of other managers within the organisation of the Entity, and has direct access to the Accountable Manager and to appropriate management personnel to raise security matters.

Key points

- 1. It is vital that senior management commit to SeMS at the outset and provide sustained support to the process as it is developed.
- 2. Ensure that adequate and appropriately skilled resource is provided for SeMS development and, wherever possible, that this resource is not diverted to other tasks.
- 3. The Security Policy should be focussed, rooted in SeMS principles, visible and shared with all staff so that it becomes ingrained in the culture

Threat and risk management

A SeMS should provide:

- 1. A process for identifying local threats
- 2. A threat assessment and scoring process
- 3. A process for assessing the security risks
- 4. A review process to identify, and monitor the effectiveness of, the mitigations for those risks

Local threat identification process

National and international threats are notified to the Entity by the Government and mitigated by regulatory measures. The Entity's threat identification process should supplement this information with a list of locally-identified threats suitably defined and assessed, for subsequent use in risk assessment.

When conducting threat and risk assessments Entities are encouraged, where appropriate, to adopt a multi-agency approach, as airports currently do. For further information please see the guidance referenced below:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11516/guide.pdf





Assessing vulnerabilities

The threat and risk assessment process should capture a clear and comprehensive picture of where vulnerabilities exist. Only by establishing where vulnerabilities lie can adequate mitigation be considered and assessed.

Assessing risks

Following assessment of each vulnerability and threat faced by the Entity, the actual risk of such an event occurring and succeeding should be assessed by the Entity.

Security risk assessment is the analysis of the security risks that have been determined.

Security risk analysis breaks down the risks into two components — the probability of occurrence of a damaging event or condition, and the severity of the event or condition, should it occur. Security risk decision making and acceptance should be specified by the Entity through a risk tolerability matrix.

Review process

The risk register and the mitigations arising from it should be reviewed by the Entity on a regular basis, and when the threat situation changes.

A formal security risk assessment and mitigation process should be developed and maintained by the Entity that ensures analysis (in terms of probability and severity of occurrence), assessment (in terms of tolerability), and control (in terms of mitigation) of risks.

The frequency of review should depend on local context such as the size or complexity of the operation.

Key points

- 1. Local liaison is important. Sharing of information with partner entities is encouraged. This will achieve a more comprehensive local threat picture than acting alone, will reduce duplication of effort and enable joined-up threat mitigation.
- 2. Local police are a source of up to date local crime information.
- 3. As much as is possible, share information with your people involve them in acting as eyes and ears.



Accountability & responsibilities

The SeMS should include:

- 1. Clearly defined accountability and responsibility for security throughout the Entity
- 2. Clearly defined governance arrangements that ensure security is accorded sufficient priority and management attention

Defined accountability and responsibilities

The Entity should define accountability and responsibilities for security throughout the Entity, including security governance responsibilities at all levels.

Security governance mechanisms

The Accountable Manager should put in place governance arrangements that provide the Entity's management with assurance that security processes are effective and that the SeMS is fit for purpose.

The governance mechanism should consider matters of strategic security in support of the Accountable Manager's security accountability. It should:

- monitor security performance against the Entity's security policy and objectives;
- monitor the effectiveness of the Entity's operational security and its security management processes;
- ensure that data is an honest and accurate reflection of performance;
- monitor the effectiveness of the Entity's operational security and its security management processes;
- ensure that any security action is taken in a timely manner; and
- ensure that appropriate resources are allocated to achieve the Entity's intended security performance.

Depending on the size of the Entity and the type and complexity of its operations, existing governance structures may be extended to incorporate these governance responsibilities. For

example, airports maintain a multi-agency Security Executive Group (SEG)² and Risk Advisory Group (RAG)³, which, with regard to airports, could fulfil the governance responsibilities described⁴.

Other Entities are encouraged to adopt a similar approach where appropriate.

Key points

- 1. Clear accountability and terms of reference bring dividends.
- 2. Regular and effective monitoring of performance, with accurate and meaningful data is essential for good governance.
- 3. Use existing structures where appropriate.
- 4. A simple diagram can aid communication and understanding of the governance structure.



² The Security Executive Group (SEG) brings together people who have the authority to take decisions about the security measures that should be put in place. It includes senior representatives from the airport operator, the local police force, the local police authority and airlines operating at the airport.

³ A Risk Advisory Group (RAG) brings together security practitioners at the airport, including representatives of the airport manager and local chief officer of police. The RAG's function is to produce a Risk Report, assessing each threat to the security of the airport. The RAG then makes recommendations about the security measures that should be taken, or continue to be taken.

⁴ Guidance on SEG and RAG: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11516/guide.pdf

Resources

An effective SeMS depends on:

- 1. The provision of adequate facilities, resources, equipment and support
- 2. The Entity placing an appropriate degree of importance on security in the selection of personnel
- 3. Appropriate specifications for security equipment and services and maintenance
- 4. Effective contracting and oversight of 3rd parties, contractors and suppliers

Provision of resources, facilities, equipment and supporting services

The Entity should determine and provide the appropriate resources that it needs to:

- implement and maintain the SeMS; and
- implement and maintain the security processes that deliver the SeMS, the Aviation Security Requirements and any other risk mitigation identified.

Personnel contributing to a security process should be competent and have appropriate training, skills and experience.

The facilities, equipment and supporting services provided should be sufficient, suitable and be maintained to achieve the security outcomes, including the Aviation Security Requirements.

The Entity should keep records of these resources for security management and performance reporting purposes, as defined in its SeMS.

Personnel competences for the SeMS

The Entity should provide adequate resources for planned tasks by:

- determining the required competences and qualifications for each role;
- stressing, for appointments to senior roles, the importance the Entity places on security; and
- providing suitably qualified personnel.

Management of third party suppliers

The ultimate responsibility for any product or service provided to the Entity by contracted entities remains with the Entity.

The Entity should define responsibilities within its own organisation for managing contracted security activities, including quality assurance of what the 3rd party is providing.

The contracted activities should be described in the Entity's SeMS.

Receiving third party services

Where the Entity is receiving a 3rd party service which impacts aviation security, it should, where appropriate, specify in the SeMS any security-related requirements, including the provision of information by the 3rd party, to enable the Entity to assure security performance.

Providing third party services

Where the Entity is providing a security related service to another party information should, where possible, be shared with that Entity to provide the latter with assurance of security performance.

Key points

- 1. Wherever possible, maintain consistent SeMS resource in order to develop expertise and maintain consistency.
- 2. Senior managers should lead in delivery of the SeMS security culture.
- 3. 3rd party providers should be part of the SeMS as well as being managed by it.
- 4. The heart of a SeMS is the sharing of information and data delivering a collaborative SeMS.

Performance monitoring, assessment & reporting

The SeMS should include:

- 1. What performance measures are used
- 2. How data is analysed to improve security
- 3. How security performance is reported internally by the Entity
- 4. How data is stored and protected by the Entity

Performance monitoring and measurement process

The Entity should use performance monitoring and measurement to verify its performance of the security processes against the Aviation Security Requirements, and the Entity's security policy, objectives, identified risks and specified mitigation measures as defined in its SeMS.

This process should include the setting of security performance indicators and security performance targets, and measuring the security performance against them. All levels of relevant management should have oversight of key performance indicators.

The performance monitoring and measurement process should include:

- addressing the performance in relation to compliance with the Aviation Security Requirements;
- assessing how effective a security process is and not just checking if it is taking place;
- security reviews including trends reviews which are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change, or to explore an increase in incidents or security reports;
- security audits which focus on the effectiveness of the management system;
- examination of particular elements or procedures of a specific operation, such as problem areas or bottlenecks; and
- internal security investigations of security incidents.

Analysis of data

The Entity should determine, collect and analyse appropriate data to demonstrate the suitability of security processes and to evaluate where improvement of the effectiveness of the security processes can be made. This should include data generated as a result of monitoring and measurement and may include data from external sources.

Corrective action

The Entity should take action to eliminate causes of poor performance in order to prevent recurrence.

Any corrective actions should be appropriate to deal with the effects of the poor performance identified by the Entity.

A documented procedure should be established to define requirements for:

- reviewing poor performance;
- determining the causes of poor performance;
- evaluating the need for action to ensure that poor performance does not recur;
- determining and implementing the appropriate action;
- maintaining records of the results of action taken; and
- reviewing corrective action taken.

Preventive action

The Entity should determine action to eliminate the causes of potential poor performance in order to prevent their occurrence. Preventive actions should be proportionate to the effects of the potential poor performance.

A documented procedure should be established to:

- determine potential poor performance and its causes;
- evaluate the need for action to prevent occurrence of poor performance;
- determine and implement appropriate action;
- Record results of action taken; and
- review preventive action taken.



Management of security data and information

The security management objective for data and information should be to ensure the security of data and information received and used so that it is protected from interference, and access to it is restricted only to those authorised.

Security reporting system

The overall purpose of the security reporting system is to use reported information from staff and the public to improve the level of security performance, and not to attribute blame.

The objectives of the security reporting system should be to:

- enable an assessment to be made of the security implications of each relevant occurrence or serious incident, including previous similar events, so that any appropriate action can be initiated; and
- ensure that knowledge of relevant occurrences and serious incidents is shared both internally
 and externally, where appropriate, so that others may learn from them and adapt behaviours
 accordingly.

The security reporting system should have the capability to acknowledge the reporter, where appropriate.

The security reporting system should have the capability to confirm receipt to the reporter, where appropriate.

The reporting process should be simple and clearly defined, including details as to what, how, where, to whom, and when to report.

Regardless of the source or method of reporting, once the information is received, it should be stored in a manner suitable for easy retrieval and analysis.

Access to the submitted reports should be restricted to protect the identity of the source, where appropriate.

The security reporting system should include a feedback system to the reporting person on the outcome of the occurrence analysis.

The security reporting system should also include a voluntary confidential reporting process for reporting security matters. An Entity's existing "Whistleblower" reporting process may be suitable for this.

Record keeping

The system used by the Entity for record keeping should provide adequate procedures for storage and backup. The system should ensure records are traceable, retrievable and accessible by those authorised.

The system should include safeguards to ensure the confidentiality, integrity and availability of the information is maintained.

Quality assurance of data and information

Honest and accurate data is essential for a SeMS to work and for Board and Regulator assurance. The quality of security-related data and information should be assured by a quality management system that controls the origination, production, storage, handling, processing, transfer, and distribution of that data and information.

Key points

- 1. Collection, analysis and sharing of honest and accurate data is an essential SeMS principle.
- 2. Effective, targeted performance measurement and reporting is part of the bedrock of a SeMS.
- 3. Think wider than security requirements how can overall performance be improved and potential gaps closed?
- 4. An open SeMS is a good SeMS. Clear reporting procedures will encourage involvement.

Incident response

The SeMS should include:

- 1. A security incident response process
- 2. Methods of testing, reviewing and improving the response plan
- 3. A procedure for the introduction of additional security measures

Incident response

All SeMS should include response processes for dealing with security incidents. The processes should be exercised or reviewed as appropriate on a regular basis.



Incident response process

The incident response process within the SeMS should ensure continuous improvement. Continuous improvement may, amongst other means, be obtained by:

- conducting a review of the relevant parts of the incident response process after a full or partial exercise:
- debriefing and analysing the response operations after an incident; and
- developing new incident procedures or systems as part of the incident response process when new threats are identified by the SeMS.

Where appropriate, the Entity should co-ordinate its incident response processes with those of other interfacing organisations.

Initiating special security measures

Changing threat information or a security incident may require the urgent application of additional security measures or the suspension of operations. The Entity should have a process for the urgent application of such additional security measures or suspension of operations.

Key points

- 1. The exercising of security incident response procedures can take many forms and can be of varying scale the size of Entity largely determines how this is best achieved.
- 2. A log of outcomes and improvements subsequently made is good SeMS practice.



Management of change

The SeMS should:

- 1. Effectively plan, communicate, implement and measure the effect of changes to security policy and procedures
- 2. Monitor and measure the effects of change on security and facilitate action as appropriate

General principles

The Entity should manage security risks related to change. The management of change should be a documented process to identify internal and external change that may have an adverse effect on security.

The management of change

Change can introduce new risks and impact the appropriateness and/or effectiveness of existing risk mitigation strategies. Changes may be internal or external to the Entity.

The Entity should establish a formal process for the management of change which takes into account:

- the criticality of systems and activities;
- the stability of systems and operational environments; and
- past performance.

When business changes are planned the Entity should consider any impact on its SeMS through its security governance processes.

Key points

- 1. Change from any source can affect security. A robust SeMS will have clear change governance in place that will mitigate risk.
- 2. An internal culture that embraces security will minimise unintentional harmful impact on security.
- 3. Security needs to have a voice when change is being considered.

Continuous improvement

The SeMS should:

- 1. Seek to improve security performance
- 2. Evaluate all aspects of security provision
- 3. Where appropriate, share security knowledge and skills

Continuous improvement

The Entity should seek to improve its security performance through proactive and/or reactive evaluation of the efficiency and effectiveness of:

- the Entity's security procedures;
- the Entity's facilities, equipment and documentation;
- individual performance in the Entity, to verify the fulfilment of each individual's security responsibilities; and
- the Entity's system for control and mitigation of security risks.

Where possible, data relating to the above points should be part of the evaluation.

Similarly the Entity should seek to improve its SeMS, as part of its security assurance, through actions such as:

- internal evaluations;
- independent audits (both internal and external); and
- continuous monitoring of security controls and mitigation actions.

Sharing of information

Whilst aviation has mechanisms for sharing information on safety and on areas of weakness, this is not always the case in the area of security.

The Civil Aviation Authority encourages industry to bring forward ideas that lead to a greater sharing of information in ways that do not compromise the effectiveness of security or disclose sensitive information. In particular, industry will be encouraged to collaborate on the development of new security management approaches, techniques and tools to assist in every Entity's continuous improvement.

Key points

- 1. A critical look at a SeMS by someone not directly involved can bring a fresh perspective and highlight gaps.
- 2. The sharing of information between SeMS entities will benefit everyone and help build security culture.



SeMS education and security culture

The SeMS should:

- 1. Explain how the SeMS principles will be promulgated at all levels of the Entity
- 2. Tailor the relevance of the SeMS education provided
- 3. Evaluate the effectiveness of the SeMS on the Security Culture of the Entity

Aims and scope of SeMS education

SeMS education includes high-level knowledge of SeMS, knowledge of the concepts and principles of SeMS and detailed training in the processes and procedures of SeMS as required.

SeMS education should be relevant to:

- security culture;
- security assurance;
- security promotion;
- security roles and responsibilities; and
- establishing acceptable levels of security.

The Entity should establish an education programme for all personnel, including all levels of management within the Entity (e.g. supervisors, managers, senior managers, and the Accountable Manager), and ensure that the effectiveness of the programme is evaluated.

The amount and level of detail of SeMS education should be proportionate and appropriate to the individual's responsibility and involvement in the SeMS.

SeMS education programme for the Entity's personnel

The programme should include the following, for each sub-set of personnel:

A. Operational personnel

- Security responsibilities, including adherence to all operating and security procedures, and recognising and reporting threats;
- Objectives should include familiarity with the Entity's security policy and should ensure understanding of the Entity's SeMS;
- How everyone can contribute to a positive Security Culture;
- Contents should include, at a level of detail appropriate to the role:
 - a) definition of threats;
 - b) consequences and risks;

- c) the SeMS process, including roles and responsibilities; and
- d) security reporting and the Entity's security reporting systems.

B. Managers and supervisors

- Security responsibilities, including promoting the SeMS and Security Culture and engaging operational personnel in threat and incident reporting;
- In addition to the objectives established for operational personnel, the objectives for managers
 and supervisors should include a detailed knowledge of the security process, threat identification
 and security risk management and mitigation, and change management;
- In addition to the programme specified for operational personnel, the education contents for supervisors and managers should also include security data analysis and the importance of data quality assurance.

C. Senior managers

 Security responsibilities in relation to Aviation Security Requirements, as well as the Entity's own security requirements, allocation of resources, ensuring effective internal security communication, active promotion of the SeMS Policy and development of a positive Security Culture;

D. Accountable Manager

The programme should provide the Accountable Manager with a general awareness of the Entity's SeMS, including SeMS roles and responsibilities, security policy and objectives, security risk management, security assurance and development of a positive Security Culture.

Key points

- 1. A SeMS can only fully deliver when an Entity has a positive and embedded Security Culture and awareness.
- 2. A SeMS education programme should reach everybody, and the message tailored to suit.
- 3. The sharing of information between SeMS Entities will benefit everyone and help build an industry-wide Security Culture.

Communication

The SeMS should describe:

- 1. The means to effectively communicate security policy, requirements and priorities
- 2. A process for measuring the effectiveness of those communications

Security communication

The Entity should communicate the SeMS objectives and procedures to all relevant persons and organisations, and the SeMS and its application should be evident in all aspects of the Entity's operations.

Security communication should aim to:

- ensure that personnel are aware of the wider security responsibilities shared by all in the context of the Entity's Security Culture;
- ensure that all relevant personnel are fully aware of the SeMS;
- convey security-critical information;
- explain why particular actions are taken; and
- explain why security procedures are introduced or changed.

Communication tools

The Entity may use various tools to communicate security information, such as:

- the SeMS Manual;
- security processes and procedures;
- security newsletters, notices and bulletins; and
- websites or emails.

Communications should observe protective security markings and dissemination guidance as appropriate.

Regular meetings with personnel where information, actions and procedures are discussed may also be used to communicate security matters.

Key points

- 1. A good communications strategy will assist to embed SeMS and an active Security Culture.
- 2. Involving many areas of the business in contributing to communications builds inclusivity in security delivery.

