

Security Management Systems (SeMS) Frequently Asked Questions

CAP 1297



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Background to SeMS

Why do we need SeMS?

In order to have day-to-day assurance that all security risks are being identified and mitigated effectively, an entity needs an organised, systematic approach and effective measurement of its security performance. This should include both the security measures it takes in response to regulations and those that it has determined are necessary to tackle any unregulated security risks.

The importance of this second group of risks should not be underestimated. Reliance on compliance with the regulations is not enough and previously unrecognised threats emerge on a regular basis.

CAA oversight alone cannot and should not assure continuous compliance – it can only verify compliance at a specific place at a specific time and draw inferences from that.

Therefore, organisations should always be alert and poised to identify new threats, especially those threats that the regulations do not cover or threats that occur as a result of the implementation of specific regulations. Equally important is, having identified these threats and consequent risks, that an entity conducts a rigorous assessment to ensure that adequate, proportionate and achievable mitigations are implemented accordingly.

SeMS provides a structured and effective way to identify and mitigate risks, and provide assurance at all levels.

What is the SeMS Framework?

The SeMS Framework can be regarded as the high-level specification for an effective SeMS. It describes the ten key components of a SeMS, and the principles behind them, but does not dictate how an organisation must implement them. This means that the Framework is flexible and straightforward to apply within an organisation.

Alongside the SeMS Framework (CAP 1223)¹ and Guidance for Accountable Managers (CAP 1224)², the CAA has also published “Implementing SeMS: An Outline” (CAP1273)³ to provide guidance on implementing a SeMS. This summarises the key points with regards to the Framework, the CAA’s approach to an industry-wide roll-out of SeMS, and how SeMS implementation may be managed. Our CAP publication on “Guidance for Small Organisations” provides tips and further guidance for implementing a SeMS, within their specific context.

¹ <http://www.caa.co.uk/CAP1223>

² <http://www.caa.co.uk/CAP1224>

³ <http://www.caa.co.uk/CAP1273>

We have a mature and integrated Risk Management system already. Why do we need to sign up to SeMS? Are there advantages to beginning to implement this now?

Experience in implementing the CAA's SeMS Framework has demonstrated the following advantages:

- It creates Board Level accountability for security, and enables them to monitor compliance with AvSec requirements as well as meeting QA requirements under current regulation;
- It drives a more assurance based regime;
- It encourages transparent and verifiable security;
- It enables more effective use of existing tools and systems;
- It supports threat assessment methodology; and
- It empowers and promotes Security Culture and pro-active reporting.

By starting SeMS now, an entity can share expertise and best practice to the benefit of all.

Is SeMS compulsory?

SeMS is not mandatory at the time of writing. However, the UK CAA supports a proposal to make SeMS a regulatory requirement and we are working with the DfT who are actively considering this.

Is SeMS suitable for IFS and Cargo?

The SeMS Framework is designed to fit all sectors and the development was guided by a working group representing all four sectors of industry, namely Cargo, IFS, Air Carriers and Airports. Entities of all sizes from all sectors are now actively implementing a SeMS and may find it helpful to read our CAP document "Guidance for Small Organisations", which includes some useful guidance for smaller entities.

Is a SeMS useful – and achievable – for a small organisation?

The SeMS Framework is designed to be adaptable to fit all sizes and types of organisation(s). An organisation should therefore determine for itself the degree of detail and record keeping required to achieve its aims, based on its SeMS needs. For example, in a very small organisation the Accountable Manager may also be the owner of the business and/or responsible for the delivery of security within the entity. In such cases communication, culture change, and performance measurement may be simpler than it is for large organisations.

Both large and small entities have already successfully implemented a SeMS and its value is proven. See our CAP document "Guidance for Small Organisations", which includes some useful guidance for smaller entities wishing to implement a SeMS.

Implementing a SeMS

Who should I speak to if I am considering implementing a SeMS?

If you are a directed party you should talk to your Lead Auditor in the first instance. You may also contact the SeMS Team directly at sems@avsec.caa.co.uk.

How do we go about implementing a SeMS?

We recommend that you treat the implementation of your SeMS as part of your business. You should start by completing a Gap Analysis, which is your first essential step in identifying any processes and procedures that require additional work to meet the requirements of the SeMS Framework. This information enables you to finalise or re-validate senior management commitment before you draw up your implementation plan. For more detail on how to implement a SeMS, see CAP 1273 “Implementing a Security Management System: An Outline”.

Is it expensive to develop a SeMS?

Developing a SeMS does not necessarily have to be a costly exercise and does not require sophisticated electronic systems. We encourage you to utilise and optimise existing processes and systems wherever possible, as appropriate for your organisation.

Gap Analysis

How much detail do I need to include in my Gap Analysis?

Your responses to the questions in the Gap Analysis do not need to be lengthy or overly detailed. The purpose of the Gap Analysis is for you to be able to identify, at the start of the SeMS process, those areas where you believe you have a suitable process already in place, those areas where there is currently no process in place, or where the process requires some improvement to bring it into line with the standards set out in the Framework document. This is crucial information as it enables an organisation to be identify areas requiring development and allocate appropriate resources to develop these.

The Gap Analysis document can be found at <https://www.caa.co.uk/SeMS>.