SAFETY MANAGEMENT SYSTEM

Safety Manager **Marco Maderna**	

Courtesy translation: for details and or specifications, please refer to the Italian version.

SUMMARY

SMS MANUAL REVISION MATRIX

ED. / REV.	DATE	SUMMARY DESCRIPTION OF THE CHANGE
Ed. 0 / Rev. 0	**30/10/2016**	Adaptation of the organisation and Airport Manual to the requirements deriving from EU Regulation No. 139/2014 and I.R.
Ed. 1 / Rev. 0	**11/12/2020**	Implementation of EU Regulation No. 139/2014. Implementation of EU Regulation No. 139/2014. More detailed description of the reporting system and related investigations; Complete review of the Change Management Procedure; Development of an analytical description of Safety KPIs within the Risk Assessment framework; Development and definition of methods for updating the *Hazard* Register; airport safety promotion programmes and related programmes; Document management of the SMS system.
Ed. 1 / Rev. 1	**24/12/2020**	Complete review of § '2.2.4.a SMS Documentation: document management' as tasks, responsibilities and archiving methods have been regulated in greater detail. responsibilities and archiving methods have been regulated in greater detail.
Ed. 2 / Rev. 0	**08/09/2021**	Following the update of certain chapters of the MoU in accordance with the provisions of EU Delegated Regulation 2020/2148, it was deemed appropriate to assign a new edition to the entire Manual.
Ed. 2 / Rev. 1	**09.06.2022**	Revision of the tasks of the Change *Management, Documentation, Safety Assessment and Analytics* function, as per the latest SEA Service Order. Complete review of the chapter on hazard identification. Review of objective management (type, owner, control process, etc.)
Ed. 2 / Rev. 2	**04/11/2022**	**Implementation of AltMoC for the SM and CMM roles.**
Ed. 2 / Rev. 3	**20/02/2023**	Revision of the MDA SMS following the CIP process underlying the Management System; introduction of PH Meetings; modification of the Safety Review Board role; modification of the Safety Committee role; improvement of the definition of the 'Safety Risk Management Process'; improvement of the definition of the 'Risk Assessment and Mitigation' process; adaptation and implementation of SPI to the 2023 scenario; improvement of the descriptive process 'Investigation activities'; improvement process relating to SAFETY Promotion.
Ed. 2 / Rev 4	**30/08/2023**	• Par. 2.2.3b.1: Organisation Chart update; • Par 2.2.5a: in the context of risk management, clarify the definitions of hazard, threat, mitigation and risk have been clarified; • Par 2.2.5.b: specify in more detail the processes for identifying hazards and threats and the various aspects taken into consideration for this purpose; • Par 2.2.5.c.3: Update on the topic of risk acceptability, describing in greater detail the issues relating to the probability, severity and acceptability of risk; • 2.2.8.a: improved description of the reporting system, including the list mandatory reports in accordance with Regulation (EU) 2015/1018 Annex IV; • 2.2.8.b: introduction of the definitions of accident, serious incident, incident and occurrence as provided for in ICAO Annex 13.

Ed. 2 / Rev 4	**30/08/2023**	• Par. 2.2.3b.1: Organisation Chart update; • Par 2.2.5a: in the area of risk management, clarification of the definitions of hazard, threat, mitigation and risk clarified; • Par 2.2.5.b: Specify in more detail the processes for identifying hazards and threats and the various aspects taken into consideration for this purpose; • Par 2.2.5.c.3: Update on the topic of risk acceptability, describing in greater detail the topics related to risk probability, severity and acceptability; • 2.2.8.a: Improved description of the reporting system, including the list of mandatory reports in accordance with Reg. (EU) 2015/1018 Annex IV; • 2.2.8.b: Introduction of the definitions of accident, serious incident, incident and occurrence as provided for in ICAO Annex 13.
Ed. 2 / Rev 5	**20/08/2024**	Updates made following and in response to the findings of the following audits conducted respectively: - Airsight No. 11690 of 29/06/2023 - Internal audit of CMM structure no. 67 of 9 May 2024 Further changes result from the revision and adoption of the new edition of the Airport Regulations. The changes made are listed below: § 2.2.3.f Safety Performance Monitoring & Measurement: improved monitoring update process; § 2.2.3.m Local Runway Safety Team (LRST): proactive approach integrated and frequency of meetings specified; § 2.2.6 Monitoring the effectiveness of safety actions and risk mitigation measures: clarification of the process for formalising Hazard Log updates; § 2.2.10 c Scope: Renamed the type of 'Minor Change' to 'Change without approval'. Aligned Annexes 5 (Types of change) and 7 (ICM form) in line with the changes made.
Ed. 2 / Rev 6	**25/06/2025**	Update in accordance with the provisions of EU Delegated Regulation 2024/1400. Introduction of Behavioural Assessment Process; Introduction to the topic of risk assessment for construction sites not subject to change procedures (LG ENAC 2016/003);

PREMISE

This Manual, developed in accordance with the principles of the Safety Management System, is a stand-alone document that forms an integral part of the Milan Linate and Malpensa Airport Manuals (MDA), in compliance with EU Regulation No. 139/2014.

Specifically, the Manual provides a structured in-depth analysis of the topics covered in Chapter 2.2 of the MDAs, which comprises twelve sub-sections (from 2.2.1 to 2.2.12). Each aspect analysed is closely linked to the operational and management procedures adopted to maintain high levels of airport safety, thus contributing to the continuous improvement of Safety Management practices.

The document was drafted based on the guidelines and recommendations provided by the relevant industry bodies, including the European Union Aviation Safety Agency (EASA) and the Italian Civil Aviation Authority (ENAC). In addition, the Manual incorporates the best practices outlined in ICAO Document 9859, which is a fundamental reference for the effective implementation of Safety Management principles within airports.

2.2 DESCRIPTION OF THE SAFETY MANAGEMENT SYSTEM

AMC1 ADR.OR.D.005 (b) (1) - GM1 ADR.OR.D.005 (b) (1) - GM2 ADR.OR.D.005 (b) (1) - AMC2 ADR.OR.D.005 (c) - GM1 ADR.OR.D.005 (c) - AMC2 ADR.OR.D.005 (c) (SMS Manual) - ADR.OR.D.027 - AMC1 ADR.OR.D.027 - GM1 ADR.OR.D.027 - GM2 ADR.OR.D.027 - AMC2 ADR.OR.D.027 - GM3 ADR.OR.D.027 (SAFETY PROGRAMMES) - GM1 ADR.OR.E.005 - ADR.OR.B.040- AMC1 ADR.OR.B.040 (a)(b) - GM1 ADR.OR.B.040 (a)(b) - GM1 ADR.OR.B.040 (f) - GM2 ADR.OR.B.040 (f) - ADR.OR.C.030 ADR.OPS.B.095 Hot spots * GM1 ADR.OPS.B.095 (b)

The Safety Management System (SMS) is a structured and proactive management system aimed at defining, monitoring and continuously improving safety performance. Used in the most advanced industrial sectors, the Safety Management System (SMS) allows a constant balance to be maintained over time between the factors that represent the protection and production of a system.
This balance is essential to ensure operational continuity by preventing undesirable situations, such as accidents, breakdowns or economic losses, which could compromise the efficiency and safety of operations. The SMS is a formalised and systematic safety management process based on the principles of prevention, monitoring and continuous improvement. It is inspired by a philosophy aimed at promoting a solid and conscious safety culture, in which safety is not perceived as a mere regulatory obligation, but as an essential and strategic value.
In the aviation sector, the SMS is a fundamental pillar for increasing the reliability and resilience of the civil aviation system. Through a proactive and data-driven approach, the system allows potential critical issues to be identified before they translate into concrete events, promoting risk reduction and improving operational effectiveness.
Thanks to the integration of structured procedures, the analysis of safety data and the adoption of international best practices, the SMS supports SEA s.p.a. in achieving high safety standards, while ensuring efficient resource management and continuous adaptation to regulatory and technological developments in the sector. To achieve this objective, the SMS aims to operate through a structured and proactive approach, focused on the identification, assessment, elimination or mitigation and continuous monitoring of potential risks (risk management). The effective application of **risk management** not only prevents accidents and operational anomalies, but also develops **greater organisational and managerial capacity,** strengthening the resilience of the system as a whole. Through constant monitoring and updating of mitigation strategies, the SMS ensures continuous improvement in operational safety, while optimising resources and decision-making processes.

This Manual is therefore an essential tool for defining and communicating SEA's approach to aviation safety and the constituent elements of the SMS. It establishes the Safety Policy adopted, ensuring its applicability throughout the company, and defines the systematic methods by which all airport operators must contribute to safety management. The Manual also provides a structured framework of *duties and responsibilities*, operating procedures, safety programmes a n d objectives to be pursued, ensuring a consistent, documented approach that complies with industry regulatory and operational standards.

As will be illustrated in the following chapters, SEA plans, coordinates and implements a series of programmes and initiatives aimed at promoting safety. These include the Safety Review Board, the Safety Committee, Safety Day, the Working Groups, the Safety Action Group (SAG) and the Local Runway Safety Team (LRST), all of which are designed to encourage dialogue between stakeholders and the continuous improvement of safety practices.

Within the SMS structure, SEA is **actively committed to spreading a culture** of safety through awareness-raising activities, including the publication of Safety Information Bulletins and Ground Safety Recommendations. It also collaborates and interacts with other company departments in the drafting and revision of strategic documents, such as the Airport Regulations, thus helping to ensure an integrated and systematic approach to safety management.

2.2.1 Purpose of the Safety Management System

The ICAO defines safety as *'the state in which the risk of harm to persons or property is made acceptable through a continuous process of hazard identification and risk management*'.

The purpose of the Safety Management System (SMS) is to implement a systematic and proactive analysis of the risks associated with airport operations, with the aim of identifying, assessing and mitigating potential safety threats. This process is designed to prevent aviation incidents and accidents, ensuring that high safety standards are maintained and operational procedures are continuously optimised.

SEA's SMS is based on in-depth analysis and continuous monitoring of all factors affecting operational safety, including human, organisational and technical aspects, in order to identify potential critical issues and implement effective corrective measures.
To ensure that high safety standards are maintained, operational performance and related trends are constantly analysed, with action taken to correct any deviations and promote continuous improvement in airport safety.
This process initiates a **preliminary assessment of the risks** associated with airport activities and is developed through **continuous monitoring** of the effectiveness of the measures adopted to mitigate them.
The analyses conducted and actions implemented concern both the activities and processes directly managed by SEA and those carried out by other airport operators present at the airport, which operate under the supervision and coordination of the Manager.
All aircraft operators, service providers and other organisations operating within the airport are required to comply with current regulatory requirements and to actively collaborate with the safety strategies promoted and adopted by the Manager, thus contributing to a safe and efficient operating environment.
Mandatory and voluntary reporting, required in civil aviation for the reporting of events and incidents that could potentially impact safety, makes a fundamental contribution in this area. This reporting system allows for the collection of data essential for risk analysis, facilitating the identification of trends and the continuous improvement of preventive measures.
The activities and roles of the various functions within the SMS organisational structure are described in detail in the following sections of this Manual, providing a clear and structured overview of the responsibilities and procedures adopted to ensure operational safety.

2.2.2 Safety Policies and Objectives

AMC1 ADR.OR.D.005 (b)(2) - GM1 ADR.OR.D.005(b)(2) - AMC1 ADR.OR.D.005 (b)(7) - GM1 ADR.OR.D.005 (b)(7) – AMC1 ADR.OR.D.005 (b)(9)

2.2.2.a SEA Safety Policy

The Accountable Manager and the entire Management of SEA Milan Airport are fully committed to developing, establishing, recognising, maintaining and constantly promoting corporate strategies and processes aimed at ensuring that all aeronautical operations are conducted in strict compliance with current regulations and officially published procedures, in order to achieve and maintain high levels of safety.
The Accountable Manager, the relevant management and all employees play an active and responsibly shared role in achieving these safety objectives. For further details, please refer to Annex 1 - Safety Policy. (Gemap SEA – Sea Corporate: https://milanairports.com/it/i-nostri-aeroporti/safety-aeroportuale)
With a view to continuous improvement, the AM also reviews the Safety Policy and the Safety Management System (SMS) process at least once a year. This review is based on both the results of audit activities and information derived from systematic sharing within the Safety Review Boards, thus ensuring that safety management strategies are constantly updated and refined.
Furthermore, in order to pursue safety objectives and in accordance with the provisions of Chapter 2.1 of the Airport Manual, the Airport Manager (AM), within the organisational structure of the management system, ensures the adequate allocation of the necessary financial and human resources.

2.2.2.b Safety Culture

The level at which SEA's SMS actively pursues continuous improvement, maintains a vigilant attitude towards hazards and employs structured systems for monitoring, analysis and investigation, expresses a concrete and shared commitment on the part of all staff and management to operational safety. This approach is based on trust in the company's management system and on a coherent set of formalised rules and policies.

Ultimate responsibility for the adoption of and compliance with effective safety policies lies with the organisation's management
of the organisation.
For this reason, a strong commitment to safety must originate from top management and spread throughout the organisational culture; clearly defined procedures, rigorous use of comprehensive checklists, clear and objective manuals, and in-depth training are all essential elements in adequately preparing operational staff and other employees to deal with abnormal situations. Particular attention must be paid to aspects related to human factors, so that people can work synergistically and in a way that maximises collective benefit. Similarly, staff morale and its impact on safety must not be overlooked by company leadership.

opportunities for improvement, in a climate of trust and without blame **(*no blame culture*):** in other words, a Just Safety Culture as a backdrop.

However, it is important to note that SEA, in line with the provisions of ICAO Annex 13 – 19 (SMS & Investigation of Accidents) and EU 376/2014, draws a line between *No Blame Culture and* disciplinary responsibility, i.e. between what falls within the culture of learning and what may require corrective or disciplinary action; in particular, intentional violations of procedures and regulations, whether deliberate or resulting from gross negligence, will not be tolerated. In such cases, the personnel involved may be subject to disciplinary, legal or criminal measures, with immediate suspension from safety-related activities.

In conclusion, it is essential to ensure and maintain an appropriate balance between a culture of responsibility and a culture of non-blame through the application of the following processes.

2.2.2.b 1 Behavioural Policy

In order to effectively support and promote SEA's Just Safety Culture, it is essential to implement a behavioural assessment process. To this end, the SEA Safety Management System adopts a decision tree-based process for the accurate analysis of adverse events or errors. This approach will help identify how human factors and organisational system deficiencies contributed to the event.

2.2.2.b 2 Purpose

The purpose of this tool is to ensure consistency, fairness and justice within the just culture policy promoted by SEA in the management of events. The process also aims to identify the root cause and mitigating or aggravating factors related to individual behaviour.

2.2.2.b 3 Applicability

The process applies to operational staff in relation to events that occurred during the performance of their duties and to all events concerning safety, and may only be used following an internal investigation.
In particular, the Behavioural Assessment Process must be adopted in cases of reports of aviation events received through GSR or other official information channels.

2.2.2.b 4 Description of the Process

The process ensures a consistent and impartial approach to identifying responsibility, evaluating actions and intentions rather than focusing solely on consequences. The 'just culture' environment ensures that people are treated fairly, but at the same time held accountable for any inappropriate behaviour.
The process consists of three stages:

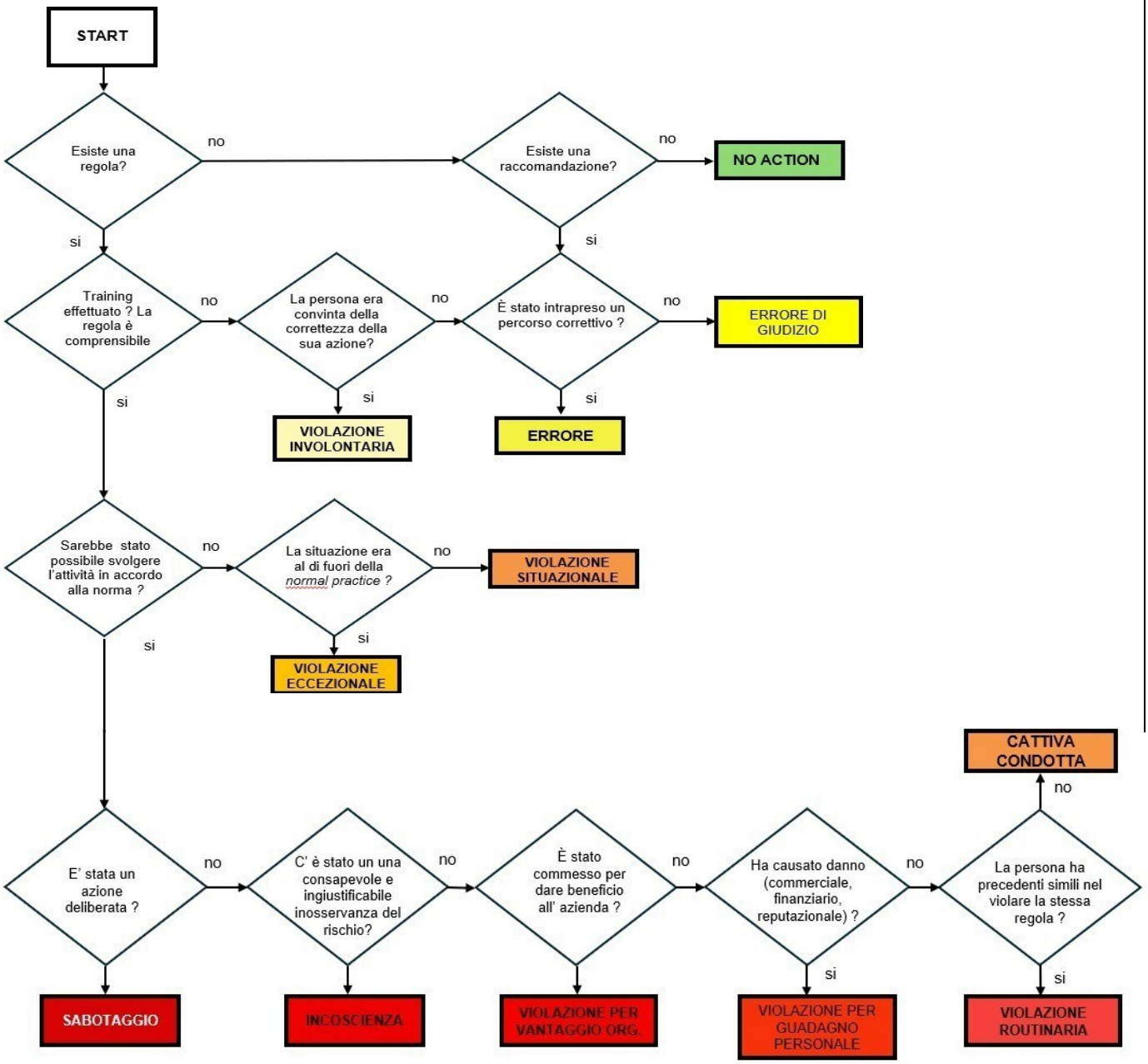
1. Investigation
2. Event Review and Behavioural Decision
3. Judgement

.2.2.b 5 Definitions and Possible Interventions

BEHAVIOURAL ACCEPTANCE PROCESS		
DEFINITION	**DESCRIPTION**	**POSSIBLE INTERVENTIONS (CORRECTIVE ACTION)**
UNINTENTIONAL VIOLATION:	Rule or procedure violated because people were unaware of the rule or did not understand it.	*Consequences for the individual: Coaching. Skills development.* *Consequences for the manager: Coaching on how to ensure that procedures are correct, accessible and understood.*
ERROR	Human action that produces an incorrect result.	*1. Human error : First time that it to the individual and/or organisation.* *y interventions for individuals/organisations: Review of the activity to assess issues related to the human factor.* *2. Routine error (same error made by different people): This is not the first time it has occurred. Consequences for individual/organisation: Coaching on how to identify errors. Reinforce the importance of reporting errors to help identify trends.* *Consequences for the manager: Coaching on error management and skills management.* *3. Routine error (personal history of errors, not committed by others in similar situations): Consequences for the individual: Assessment of suitability for work. If appropriate, coaching.*
ERROR OF JUDGEMENT	Actions that proceed as planned but do not achieve the intended goal due to an inadequate plan or a wrong decision. An error of judgement is a 'cognitive error', i.e. focused only on what is immediately visible.	*Consequences for the individual: Coaching/skills development. Reinforce the importance of reporting errors to help identify trends and root causes.*
MISCONDUCT	Inappropriate behaviour by an employee or professional	*Consequences for the individual: Coaching/skills development of skills.*
EXCEPTIONAL VIOLATION	Deliberate failure to comply with rules in unforeseen or undefined situations. This is a violation that occurs when something goes wrong and the operator believes that the only solution is to break the rules, while assuming a risk	*Consequences for the individual/organisation: Coaching. Review of staff training methods for managing emergency situations.*
SITUATIONAL VIOLATION	Breach of rules due to pressure to complete a task or difficulty in complying with the rule in the given circumstances. If the rules were followed, the work	*Consequences for the individual: Coaching on the need to report when rules cannot be followed and/or to stop work until it can be performed safely.* *Minor disciplinary action in accordance with company practices.*

	could not be done; instead of stopping, the work is done anyway, deliberately breaking the rule.	*Consequences for the manager: Review the applicable rules and verify their suitability for the purpose.*
ROUTINE VIOLATION	A violation that has become the norm through habit or practice.	Everyone does it: Others would have done or would do the same. *Consequences for the group: Coaching. Consequences for the manager: Coaching on how to manage rule violations together with the team.* Personal history of violations: The individual has a history of violations and poor respect for rules and procedures in general. *Consequences for the individual: Disciplinary action in accordance with company practices.* *Consequences for the manager: Coaching on how to recognise repeat offenders.*
NON-COMPLIANT APPLICATION OF COMPANY PROCEDURES POSSIBLE RECKLESS VIOLATION	Possible reckless violation.	*Consequences for the individual: Possible disciplinary action and/or coaching. If this has happened before, follow the formal warning procedure. Consider anonymously publishing the violation and its consequences to raise awareness among staff.*
VIOLATION FOR PERSONAL GAIN	Deliberately not following the rules for personal gain.	*Consequences for the individual: Disciplinary action and/or coaching. If this has happened before, follow the formal warning procedure. Consider anonymously publishing the violation and its consequences to raise awareness among staff.*
VIOLATION FOR ORGANISATIONAL GAIN	Deliberately not following the rules to benefit the organisation. The person committing the violation believes it is better for the company to do so, to improve performance or to please superiors.	*Consequences for the individual: Coaching on the need to report when rules cannot be followed and to stop work until it can be done safely. Minor disciplinary action in accordance with company practices. Reinforce acceptable/unacceptable behaviours.* *Consequences for the manager: Coaching on handling rule violations. If this violation has occurred in the past, formal discipline is necessary for careless supervision that creates a culture that encourages such behaviour.*
RECKLESSNESS	Lack of consideration for dangers or consequences. The person committing the violation does not reflect on or care about the consequences. Gross negligence may fall into this category.	*Consequences for the individual: Suspension from work. Management through disciplinary action. Depending on the outcome of the investigation, formal warning or other disciplinary action in line with company procedures.*
SABOTAGE	Deliberately damaging, destroying or obstructing something. Sabotage requires intent in both the action and the consequences to cause damage, disrupt operations operations or instil fear	*r consequences for the individual: Disciplinary action. Civil and/or criminal proceedings may be brought.*

This decision tree will be used exclusively with the support of the Airport Safety Department. In the event of disciplinary measures, the Human Resources Department must be involved.



2.2.2.b 6 Final judgements and decisions

Based on the Behavioural Report, a final judgement will be issued and a decision will be made regarding the event that has occurred; at this stage, at least the following representatives must be present:

- Accountable Manager, if required
- Safety Manager
- HR Manager, if required
- Head of the function or department involved.

Determination of intervention: what needs to be done to reduce the likelihood of recurrence at the individual and organisational levels? For an intervention to be successful in reducing the likelihood of new events, it must be appropriate to the type of behaviour classified by the system. Errors, oversights and violations have different psychological and motivational causes, and it is therefore essential to take these into account when developing the intervention.

Depending on the degree of culpability attributed, changes may be made at the individual, operational, situational or environmental level; in addition, appropriate administrative or disciplinary actions may be taken, managed by the HR department.

2.2.2.c Safety objectives

Based on the performance of the Safety Performance Indicators (SPI) for the last calendar year, focusing on those associated with higher rates, the Safety Manager, in collaboration with the Nominated Persons, identifies the objectives for the current year. Once the reduction rate has been assessed for each objective, the respective process owners and functional interdependencies are associated. The objectives identified are consistent with the Safety Policy and are also designed to be S**.M.A.R.T:** (specific, measurable, acceptable, realistic and tracked over time).

Therefore, the objectives are:

- Specific: in order to achieve maximum results, a goal must be clear and specific.
- Measurable: in order for a quality objective to be effective, it must be measurable.
- Acceptable: for a goal to be acceptable, it must first be defined and approved at the level of Nominated Persons; once they have accepted the goal, it must be communicated to every level of the organisation, which will be required to implement plans to achieve the goal, and the people at those levels of the organisation must agree that the plan is acceptable.
- Realistic: it is advisable to identify objectives that can be achieved.
- Time-bound: each objective is always associated with a clearly defined deadline. When

planning how to achieve its objectives, SEA also determines:

- what will be done;
- what resources will be required;

- who will be responsible;
- how the results will be evaluated.

The objectives are presented at the first Safety Review Board meeting of the year, and in any case no later than January, and approved by the Accountable Manager. For each individual objective, the following are identified:

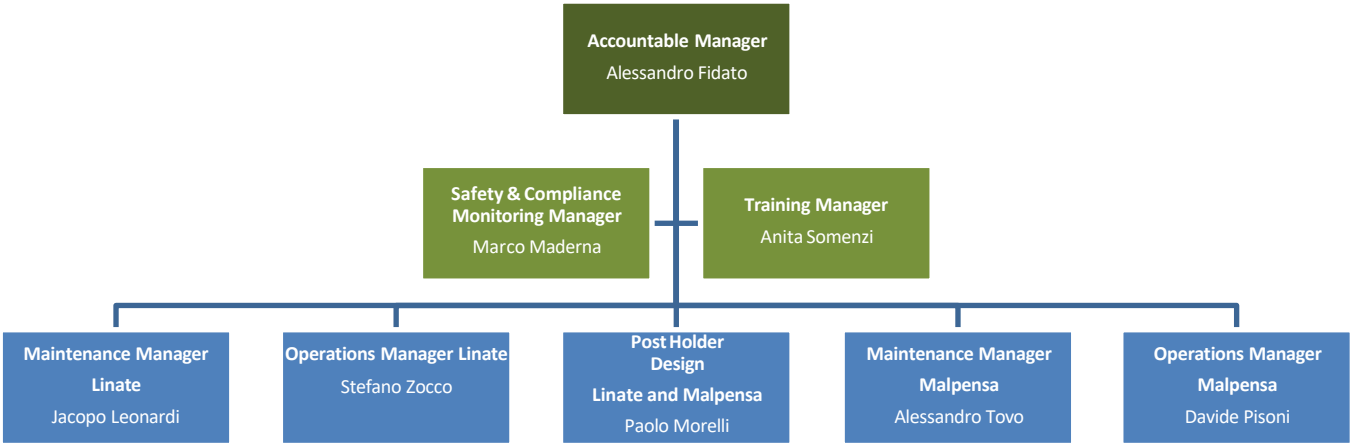
- Classification;
- Objective description;
- Calculation method;
- Target;
- Target value.

These objectives are outlined in a specific report drawn up annually following their internal approval process, sent to the Nominated Persons, filed and stored in the SM secretariat for a period of at least 5 years. The established objectives are monitored and presented monthly in the Safety Review Board and Safety Action Group meetings. For the purposes of monitoring the objectives and measuring their actual achievement, specific indicators and targets (*Target Level of Safety* - TLS) are defined for each objective. The documentation relating to the objectives is archived and stored at the SM secretariat.

2.2.3 The organisation's responsibilities in terms of Safety

AMC1 ADR.OR.D.005 (b)(1) - GM1 ADR.OR.D.005 (b)(1) - GM2 ADR.OR.D.005 (b)(1)

The following is SEA's organisational chart in relation to safety responsibilities, with particular reference to the Nominated Persons appointed within the company and their hierarchical and functional relationships within the company organisation.



2.2.3.a Accountable Manager

The Accountable Manager is responsible for the certification and operation of the airport and is the guarantor of the SEA organisation in accordance with EU Regulation No. 139/2014 and subsequent amendments and additions and related applicable regulations. Further details regarding the responsibilities of the Accountable Manager are also provided in point 2.1 of Chapter 2 of the MDA (to which reference should be made).
He also ensures the compliance of the company and its management system with the Certification Base, in accordance with the provisions on the provision of aeronautical data and information. In particular, the Accountable Manager:

- Ensures that the MDA reflects the SEA organisation
- Is the contact person for ENAC for all activities concerning airport certification
- Appoints the Nominated Persons.

For a more comprehensive description of the role and functions of the Accountable Manager and the Nominated Persons appointed by the company for the various areas of competence, please refer to § 2.1 of Chapter 2 of the MDA - Part B.
Below is a description of the key safety responsibilities of the professional figures within SEA's Safety Management structure, starting with the Safety Manager and cascading down to the organisational structures under his or her authority.

2.2.3.b Safety Manager

Within the SMS organisational structure, the Safety Manager is the person appointed within the company to be responsible for the correct management and implementation of the SMS system and reports directly to the Accountable Manager. He/she has the authority and autonomy necessary to carry out the functions and responsibilities assigned to him/her by the relevant regulations and ensures that SEA's SMS system complies with the applicable regulations, as well as with the parts described in this document relating to ICAO Doc.
No. 9859 applicable to airport operators. The Safety Manager is the key figure responsible for the development, administration and maintenance of an effective SMS system. His role includes the following responsibilities:

- Facilitating the identification, analysis and management of risks;
- Monitoring the implementation and operation of the SMS, including safety actions;
- Managing the airport reporting system;
- Providing periodic reports on safety performance;
- Ensure that SMS system documentation is maintained;
- Ensure the availability of safety training that meets acceptable standards;
- Provide advice on safety issues;
- Initiate and participate in internal analysis activities on occurrences

SEA Milan - Airport has merged the roles of Compliance Monitoring Manager (CMM) and Safety Manager (SM) into a single role through AltMoC, known as Safety & Compliance Monitoring Manager (SCMM).

All company functions are required to contribute to the flow of information, keeping the Safety Manager and Accountable Manager systematically informed and ensuring their contribution to the effectiveness of the SMS system. The Safety Manager is responsible for directing the Safety Services Office (renamed Airport Safety), whose functions can be summarised as follows: developing safety investigations relating to reported occurrences, managing and supervising the hazard identification system, monitoring safety performance, and assisting company managers on safety issues. SEA has established Safety Services Offices at Linate and Malpensa airports, as detailed in § 2.2.3e.

The Safety Manager is supported by the entire company structure and, with regard to the duties assigned to the Safety Services Officer (renamed Airport Safety Manager) in accordance with AMC1.ADR.OR.D.005(b), has the following organisational functions at his disposal (described below):

- **Airport Safety:**
    - Risk Assessment, Change Management and Documentation.
    - Safety Services Office, divided into two organisational units in Linate and Malpensa.

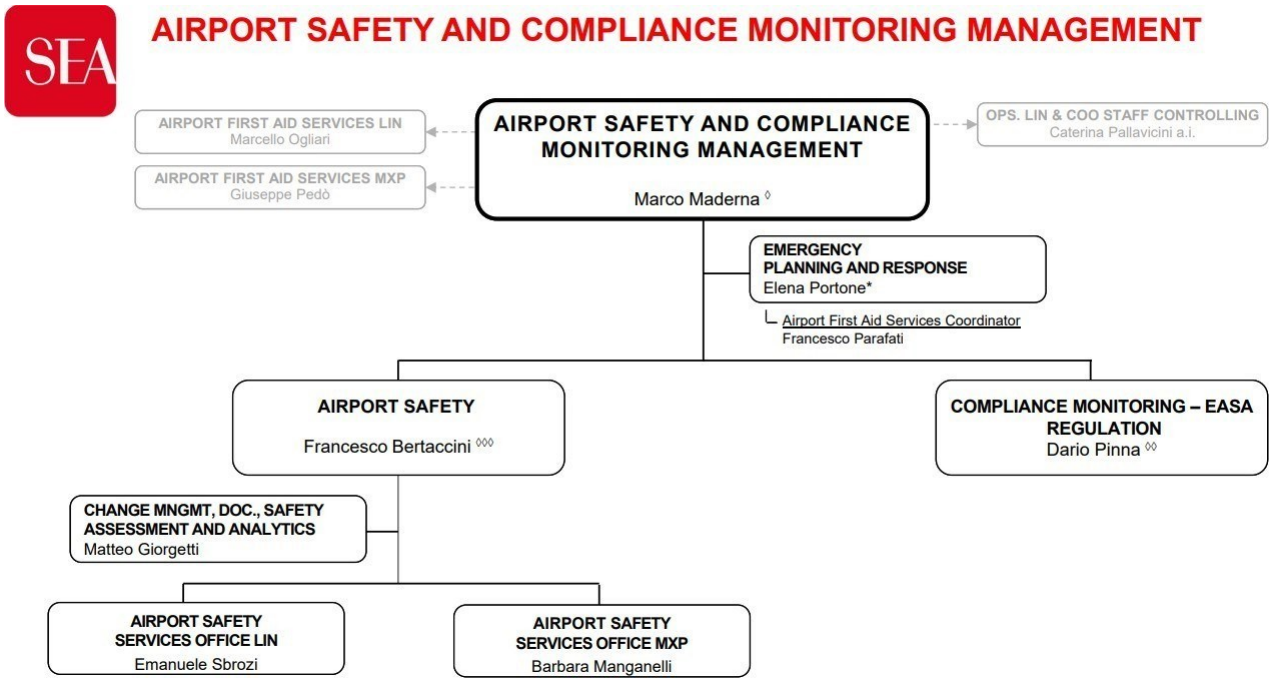
- **Emergency Planning and Response.**

2.2.3.b.1 Characteristics of the Safety Manager

In accordance with the requirements of current legislation, the following elements constitute the profile of the skills required of the Safety Manager:

- adequate experience and skills in airport operations, maintenance or similar areas;
- adequate knowledge of safety management and regulatory compliance;
- adequate knowledge of the airport manual;
- adequate knowledge of airport operations;
- in-depth knowledge of the requirements applicable to aerodromes.

For each function within the SMS system structure reporting to the Safety Manager, SEA has defined specific organisational and operational tasks, as well as the responsibilities associated with the performance of the respective functions and competences identified.



◊ Compliance Monitoring Manager and Safety Manager pursuant to Reg. (EU) 139/2014.
◊ ◊ Deputy Compliance Monitoring Manager pursuant to Regulation (EU) No 139/2014.
◊◊◊ Deputy Safety Manager pursuant to Reg. (EU) 139/2014.

2.2.3.b.2 Organisational chart and responsibilities within the SMS function

The following paragraphs describe in detail the role and functions of each organisational unit.

2.2.3.c Airport Safety (Safety Services Office)

In line with the instructions received from the Safety Manager, the Airport Safety Manager contributes to the effectiveness of the Safety Management System by defining specific intervention programmes, detecting and analysing (a) operational events, (b) compliance of actual behaviour with the procedural system and (c) the actual adequacy of procedures with regard to airport safety, as well as by proposing appropriate corrective actions. In this context, in accordance with the relevant legislation in force (EU Reg. No. 139/2014), he/she ensures:

- Liaising with the company departments responsible for airport safety aspects, in accordance with the provisions of EU Regulation No. 139/2014;
- The implementation, management and development of reporting system policies, including through the use of appropriate IT support;
- The development and maintenance of Safety *Performance Indicators* (SPIs) for activities relating to airport safety and, more generally, for the adequate statistical analysis of events, including with a view to verifying the effectiveness of the identified SPIs;
- Relationships with the company departments involved and with airport entities and/or bodies for aspects relating to airport safety;
- Interfacing with PH/Managers and the company departments responsible for emergency procedures;
- The organisation of safety groups and committees (SRB, Local Runway Safety Team, SAG, etc.) with internal SEA and external parties;
- The collection and analysis of information useful for reviewing and improving the SMS system;
- Operational liaison with the Compliance Monitoring - EASA Regulation function for the management of any anomalies identified in audits, both in the context of airport aviation processes and in relation to construction sites for their impact on the safety of aeronautical activities;
- Proper investigation of all occurrences reported in the Safety Management System in relation to operational risk management; i n this context, ensuring the development and management of the Hazard Identification programme and ensuring the updating of the risk assessment for the hazards identified, as well as the analysis of new hazards, including those resulting from substantial infrastructural, operational or procedural changes, new and/or different equipment or facilities;
- The transfer of any non-conformities found during the investigation activities to the competent functions for appropriate corrective actions and/or reports to the ENAC Airport Management, both in the context of aviation processes and as a result of infrastructural changes with potential interference with airport safety levels;
- Supervision of the sending of mandatory reports to the competent authorities (ECCAIRS 2.0);
- Examination of the content of the manuals received in relation to the certification of airport ground handling service providers, providing opinions on the safety aspects required by law and stated in the 'Operations Manual';
- Support for PH/Managers in verifying the necessary links between Handlers and Airport Operators, with reference to Safety Reports (GSR), emergency procedures, and training requirements on airport safety;

- *Safety promotion and stakeholder* involvement activities to encourage and promote a positive safety culture in its various logical and operational dimensions, including interaction with the various company departments responsible for different issues.
- Supervising the management and coordination of the change management procedure in the event of organisational, procedural and/or infrastructural changes, also taking into account any findings formalised by the Compliance Monitoring - EASA Regulation function;
- Operate, for the above purposes, in accordance with current legislation and in conjunction with the Nominated Persons.

2.2.3.d Safety Services Office Linate - Malpensa

The Airport Safety Manager is responsible for the two airport organisational units.
In line with the instructions received from the manager, for the airport in question, they contribute to the effectiveness of the SMS system by proposing and implementing specific intervention programmes, the detection and analysis of (a) operational events, (b) the adherence of actual behaviour to the system of procedures, and (c) the actual adequacy of procedures with regard to safety protection, as well as by proposing appropriate corrective actions. In particular, they are responsible for:

- Ensure operational links with the company departments responsible for aspects relating to Airport Safety, in accordance with the provisions of EU Regulation No. 139/2014;
- Ensure the operational management of the reporting system, including through the use of appropriate IT tools;
- Ensure the collection/extraction of statistical data necessary for feeding KPIs for activities relating to airport safety;
- Ensure operational relations with airport entities and/or bodies with regard to aspects relating to airport safety;
- Ensure operational interface with PH/Managers and relevant company departments in relation to emergency procedures;
- Ensuring support for the organisation of the Safety Review Board, Local Runway Safety Teams and Safety Action Groups with all external parties and the relevant SEA departments;
- Ensure the collection of information useful for reviewing and improving the SMS system;
- Contribute to the flow of information to the Compliance Monitoring - EASA Regulation function in relation to any non-conformities found during *investigation* and *monitoring* activities, both in the context of airport aviation processes and as a result of construction site activities with potential interference/impact on the safety level of aeronautical activities;
- Ensure proper investigation of all *occurrences* reported to the SMS function in relation to operational risk management;
- Ensure, by liaising appropriately with the Airport Safety Manager, that the competent authorities of the mandatory reports required (ECCAIRS 2.0);
- Contribute to the examination of the content of the manuals received in relation to the certification of airport ground handling service providers, ensuring the relevant analyses for the safety aspects required by law and declared in the Operations Manuals of each handler;
- Ensure operational support to PH/Managers for the verification of the necessary links between handlers and airport operators, with reference to safety reports (GSR), emergency procedures and training needs on airport safety;

- Proposing appropriate initiatives to contribute to *safety promotion* and *stakeholder* involvement in order to encourage and promote a positive safety culture, in its various logical and operational dimensions, including interacting with the various relevant company departments for the airport in question;
- Operate, for the above purposes, in accordance with current legislation (EU Regulation No. 139/2014).

2.2.3.e Occurrence and Safety Investigation

With regard to airport safety aspects, it is responsible for:

- Initiating specific safety investigations in relation to operational risk management, for control and reporting activities;
- Identifying the severity of events, in accordance with current legislation, and assessing initial risk acceptability using a tolerability matrix;
- Proposing recommendations following the preparation of reports, dedicated statistics and investigations into events and incidents;
- Support the management of the Reporting System and its dissemination;
- Propose any *mitigation actions* following the analysis of occurrences;
- Collaborate, in line with the guidelines defined by the airport Safety Services Office, with the *Risk Assessment & Change Management* unit for the control and development of *the Hazard Register*;
- Support the airport Safety Services Office in compiling statistics for review and technical safety meetings.

2.2.3.f Safety Performance Monitoring & Measurement

With regard to Airport Safety aspects, he/she is responsible for:

- Ensuring the correct application, through specific monitoring and field inspections, of the provisions of the operating procedures and manuals of those operating at the airport;
- Developing statistics based on operational monitoring and inspections, providing a qualitative and quantitative overview of the activities carried out and reporting the results to their managers;
- Supporting, in line with the guidelines defined by the airport Safety Services Office, the Compliance Monitoring - EASA Regulation function with regard to operational procedural aspects, in order to ensure the implementation of the provisions of the specific regulations;
- Define and keep up to date the checklists for monitoring the activities of all persons operating on the premises, reporting the results to the Safety Services Office manager at the airport. These checklists are updated on an ongoing basis in line with regulatory and procedural updates in order to ensure that they always comply with the latest standards;
- Propose any mitigation actions following the monitoring carried out;
- Produce specific documentation for use in Safety Committees and other safety committees;

- Verify the effectiveness of the mitigation measures implemented in the field;
- Collaborate with company structures and bodies responsible for activities related to the issuance of Airport Licences.

The SMS staff involved in *Safety Performance Monitoring & Measurement* activities are equipped with additional specific resources dedicated to monitoring activities, namely the so-called *Safety Observation Agents*. These agents perform control and supervision functions in the field, in the airside area, which also extend to night-time airport operations. This additional function is aimed at performing a more effective and visible control role, reminding all airport operators to comply with airport procedures and current safety rules in order to raise safety levels to optimal conditions. The activities in question are described in more detail in § 2.2.7 of this Manual, on the subject of *Safety Performance Monitoring (*to which reference should be made).

The responsibilities of the function are illustrated graphically in Figure 1 of Annex 3 to the SMS Manual: *FLOW-CHARTS*.

2.2.3.h Safety Observation Agent

With regard to airport safety, he/she is responsible for:

- Monitoring airside and landside operations at the airport to verify compliance with airport regulations, the airport manual and applicable ordinances and procedures and/or with solutions implemented following investigative analyses conducted by the Occurrence and Safety Investigation Department
- Monitoring the driving of vehicles on the airside, verifying that driving behaviour complies with the Airport Regulations, the Airport Manual and applicable ordinances and procedures
- Notify the Safety Service Office of the airport of belonging and third parties of any anomalies found during the monitoring activities carried out
- Collaborate, in line with the guidelines defined by the airport Safety Services Office, with the *Risk Assessment & Change Management* unit to verify the requirements and recommendations issued in the event of 'airside works'
- Raise awareness to promote and encourage responsible behaviour and awareness of the risks arising from the movement of vehicles in the movement area and aircraft turnaround operations.

2.2.3.i Change Management, Documentation, Safety Assessment and Analytics

Reports directly to the Airport Safety Manager. Responsible for managing the following activities:

- Ensuring the preparation of aeronautical risk analyses (including 'prospective' risk assessments) based on the findings of specific technical meetings, the results of field monitoring activities, internal audits and those carried out by the ENAC Surveillance Team;

- Ensure contribution to airport safety promotion by identifying priorities for action and monitoring the targets set, through the management and development of aviation safety data analysis concerning objectives, ECCAIRS 2.0 reports, ANSV and GSR history;
- Promote the development of Safety Performance Indicators (SPI), applying the best shared methodologies and benchmarks with other national and European airports;
- Develop and manage the Hazard Identification programme; in this context, ensure that the risk assessment in the Hazard Log is updated and carry out analyses related to new hazards following infrastructural, operational and procedural changes, new and/or different equipment or facilities; in this context, in conjunction with the Nominated Persons, ensure the development of adequate information flows for the correct and timely reporting of new hazards identified;
- Ensure the management and coordination of *the Change Management* procedure in the event of organisational, procedural and/or infrastructural changes, taking into account any findings formalised by the Compliance Monitoring - EASA Regulation function; in this context, ensure the necessary process of updating the documentation relating to the Safety Management System (SMS);
- Ensuring the preparation and traceability of supporting documentation for the Safety Review Board, Safety Committee and Local Runway Safety Team (LRST);
- Operate for the above purposes, in accordance with applicable legislation (EASA regulations, including EU Regulation 2018/1139 and EU Regulation No. 139/2014) in conjunction with the relevant SEA departments and Nominated Persons.

2.2.3.j SMS Documentation

In line with the guidelines defined by the Head of Change Management, Documentation, Safety Assessment and Analytics, he/she is responsible for:

- Identifying methods for preparing and storing documentation (electronic, paper and audiovisual media);
- Preparing, tracking, archiving and storing the minutes of meetings of: Safety Review Board, Safety Committee, Working Group, LRST, SAG, ICM, PH Meeting, etc.;
- Ensuring the record keeping of the results of SMS system activities;
- Updating the SMS system documentation following regulatory, organisational and/or procedural changes affecting the system, providing for ENAC (DO) approval where required;
- Update, as directed by the SM, the SMS Manual to be submitted for approval by ENAC;
- File the original documentation with the Safety Manager's Secretariat and organise electronic archiving on the company server.

2.2.3.k Risk Assessment

In line with the guidelines defined by the Head of Change Management, Documentation, Safety Assessment and Analytics, he/she is responsible for:

- Developing aeronautical risk analyses based on the results of field monitoring activities, internal audits and those carried out by the ENAC Surveillance Team;
- Developing, following a company change, the relevant safety analyses and, if requested, preparing specific documents in collaboration with third parties, where applicable (ENAV, in accordance with the provisions of the Framework Agreement signed and related annexes); it should be noted that whenever a change may interfere with other parties external to the Manager, they are directly consulted and involved in the change activities, as detailed in the relevant section of this Manual (2.2.10 *Change Management)*;
- Update the identified Safety KPIs and develop new indicators where necessary;
- Constantly update the hazard identification programme and the related Hazard Log;

2.2.3.i SMS COMMITTEES. The Safety Review Board

In order to support the Accountable Manager in implementing safety policies and strategies in pursuit of the set objectives, a high-level committee called the Safety Review Board is established, chaired by the AM and composed of the following individuals:

- The Safety Manager, who convenes the committee and manages its agenda and related documentation
- The Compliance Monitoring Manager
- PH Design Linate and Malpensa
- The Maintenance Manager at Linate
- The Maintenance Manager at Malpensa
- The Operations Manager at Linate
- The Operations Manager at Malpensa
- The Training Manager
- The Directors and Heads of Company Departments, as required.

The Safety Review Board aims to:

- monitor safety performance in relation to policies and objectives;
- monitor the implementation of the required corrective actions, verifying their implementation according to the agreed timelines;
- monitor the effectiveness of the organisation's safety management processes.
- propose the most appropriate courses of action;

The Safety Manager sets the agenda, proposing the topics to be analysed during the meeting and communicating the relevant information and data to the Accountable Manager in order to support decisions in an objective manner.
The Safety Review Board meets quarterly (Q); additional extraordinary meetings may be convened for contingent needs arising from unexpected factors of compelling interest to a particular airport.

The SRB meets periodically to evaluate and share:

- Safety indicators
- Results of corrective actions
- Results of the compliance auditing system
- Results of reporting system analyses
- Risk identification and associated actions for managing related aspects
- Activities resulting from the findings of the ENAC certification team audits
- Activities of the Safety Committee

The Safety Review Board also ensures that adequate resources are allocated to achieve the established performance targets. The functions of the Safety Review Board are illustrated in Fig. 2 of Annex 3 to the SMS Manual: *Flowcharts*.

The topics included in the agenda are defined on the basis of the following elements:

- Analysis of Ground Safety Reports;
- Feedback from the Safety Committee (SAG), Working Groups and LRSTs;
- Issues highlighted by the Accountable Manager or Nominated Person;
- Results of analysis and monitoring activities carried out by the SMS function;
- Any contributions on insurance aspects from the relevant area;
- Results of the auditing system;
- Assessments of the outcomes of corrective actions implemented;
- Identification of risks and associated actions for managing related aspects;

Before each Safety Review Board meeting, the SM shares the agenda items with the participants; the Accountable Manager sets the agenda and conducts the meeting with regard to the necessary actions for resolving ongoing issues and implementing effective preventive measures. The results of the SRB's analyses are made available to company managers, who prepare the necessary communications to the companies and/or entities involved; the conclusions of the Board's work, as indicated by the Board itself, may be used as a topic in the Safety Committee.
All Safety Board meetings are minuted by the Safety Manager's office, the minutes are sent to the committee members and a copy is archived as described in paragraph 2.2.4.

2.2.3.I Safety Committee

SEA defines, coordinates and implements programmes aimed at promoting safety and the exchange of information in the airport environment. In this context, **Safety Committees** have been set up at **Malpensa and Linate** airports, with **monthly** meetings.
All parties operating within the airport are **required to participate** in these committees, ensuring an active contribution to improving safety. Participants must have decision-making autonomy and the ability to take responsibility towards external parties, representing their organisation in an authoritative manner.

The Safety Committee is an organisational and advisory body responsible for coordinating the implementation of airport safety policies in collaboration with all parties operating at the airport.
It is the main decision-making body in which the safety programmes for which SEA, as airport operator, is responsible are defined, organised and implemented. In addition, the Safety Committee is the forum in which **the Safety Programmes** are **established and formalised**, ensuring a structured and shared approach to operational safety management. The macro-areas identified as the subject of the Safety Programmes include, by way of example, the following thematic areas:

- RUNWAY SAFETY (Runway Incursion/Excursion).
- FOD PREVENTION.
- APRON SAFETY:
    - Safety Ground Operations
    - Airside drivers
    - Aircraft manoeuvre interference
    - Damage to aircraft.

The procedures for public bodies to participate in the Safety Committee are shared with ENAC DA, which participates in the same committee as an observer; active participation in the Safety Committee by all parties contributes to improving operating conditions and promotes compliance with the obligations arising from participation in the SMS.

The Safety Manager sets the annual schedule of Safety Committee meetings, integrating it with the schedules of other safety committees (e.g. LRST, WG).

The purpose of this committee is to:

- jointly **assess** safety events that require further investigation;
- **receive** statistical information on events and incidents, proposing solutions;
- **advise** on problems identified in the movement area, such as:

    - promoting the safety behaviour to be adopted;
    - FOD prevention;
    - distribution of safety-related initiatives;
    - ramp equipment;
    - vehicle traffic;
    - safety instructions or updating of existing ones;
    - methods of distribution and promotion of safety initiatives on the apron;
    - planned changes or developments in the movement area;
    - standards relating to operating procedures;

The Safety Committee agenda is based on the following elements:

- GSR analysis;
- Feedback from the Safety Review Board/SAG and other safety working groups;
- Issues highlighted by NPs;
- Significant updates to the Airport Manual and/or Airport Regulations:
- Results of analyses, audits and monitoring carried out;

- Identification of risks and associated actions for their management;

The recommendations prepared by SMS for airport operators (Ground Safety Recommendations) are also addressed; each area of intervention is managed through a series of structured activities designed to achieve the objective of reducing the critical phenomenon.

Within each individual programme, the activities identified in the ' ' phase of the risk analysis will be shared in specific actions to be managed over a period of time compatible with the identified objective. The effectiveness of the actions carried out will be assessed by comparing the initial analysis data with the data following the interventions. During the review of the actions taken, in the absence of significant improvements, the action items will be re-evaluated and any new mitigation measures identified, where possible.

The *Change Management, Documentation, Safety Assessment and Analytics* function draws up the minutes of the meetings, highlighting any actions agreed upon for the purpose of improving the system and indicating the *owners* of the individual processes discussed by the Committee. The minutes are published on the internet in a dedicated repository so that everyone can view them and/or propose any changes.

2.2.3.m Local Runway Safety Team (LRST)

The *Local Runway Safety Team* (LRST) is a specialised committee dedicated to safety in the manoeuvring area. Its task is to analyse and assess operational safety on the airside in order to contribute effectively to the adoption of appropriate corrective and/or preventive measures aimed primarily at containing and/or reducing the number of *runway incursions* (RI) and *excursions* (RE). The se committees are convened, organised and managed by the Safety Manager, in collaboration with the Operations Manager.

RWY Incursions are defined as all *occurrences* in which an aircraft, vehicle or person is mistakenly present in the protected area of the surface intended for aircraft landing or take-off. ***RWY Excursions*** are defined as *occurrences* in which an aircraft deviates from or exceeds the runway surface during take-off or landing.

The LRST has the specific task of analysing and assessing the operational safety of flight infrastructure, contributing to the adoption of appropriate corrective and/or preventive measures aimed at preventing and containing runway incursions and excursions. To this end, the LRST is composed of representatives qualified in the field of manoeuvring area operations for the following subjects:

- SEA (Operations, SMS, CMM, Design, Maintenance)
- ENAV
- CNA (AOC representatives, CU, Airport Managers, etc.)
- Pilots and/or representative associations
- VVF (Local Command)
- Any other parties involved.

Here, events related to operations in the manoeuvring area are analysed in order to identify appropriate mitigation actions as part of a risk prevention programme. The main objectives of the LRST are:

1 The identification of potential runway safety issues, including the need to establish access points or other issues in airport areas and to review the accuracy of entries in the AIP, such as the definition and review of hot spots;

2 The development and implementation of information campaigns (e.g. in anticipation of the start of peak season or before an unusual event), producing and distributing maps of access points or other material;

3 Monitoring the type of runway incursion/excursion; disseminating *Safety Information Bulletin* (SIB) recommendations provided following findings from accident and incident investigations, as well as *lessons learned* and *best practices*;

4 Verifying compliance, in relation to different weather and light conditions, of vertical, horizontal and AVL signage, identifying any areas for improvement and/or redesign;

5 Analyse the operating procedures of those interacting with the manoeuvring area in order to integrate and improve them, where possible, so as to minimise the risk of runway incursions, with particular attention to existing or proposed procedures;

6 Develop joint SEA - ENAV training programmes to familiarise relevant personnel with runway excursion and incursion prevention, in order to increase their *safety awareness*;

7 Analyse the potential risks associated with runway incursions/excursions before implementing any changes to the airport's flight infrastructure;

8 Assess the effectiveness of the operational solutions implemented periodically.

The LRST is responsible for sharing and disseminating information relating to a change when it is relevant to safety aspects affecting the manoeuvring area [GM2 ADR.OR.B.040(f)].

The safety analysis programme provides for two types of approach:

A) PROACTIVE APPROACH:

- Verifies that the handling procedures adopted and the signage implemented do not present any ambiguity, particularly for operations in low visibility conditions;
- Carries out awareness campaigns on hot-spot points;
- Monitors the correctness of the phraseology adopted by operators;
- Verifies the adequacy of the content of training courses relating to driving licences.
- Investigates the impact of any maintenance activities or new infrastructure construction on flight operations in order to ensure operational safety.

B) REACTIVE APPROACH:

- Identify potential hazards and consequences in the *hazard identification* process*:* determining the risk and assessing possible compensating factors;
- Identifies solutions and measures to prevent runway incursions and assesses their effectiveness;
- Disseminates the results of event analyses;
- Develops and manages an effective system for collecting data on RI events;
- In collaboration with SEA *Training Shared Services*, it organises and manages appropriate training activities dedicated to raising awareness of the event, in order to promote a culture of safety.

The LRST meets at least twice a year at each individual airport.

2.2.3.n Working Group

Within the Safety Committees, and in view of operational requirements, for better management efficiency or due to the complexity of airport operations, each participant has the right to request the establishment of a special working group, known as a Working Group (WG); the members of the WG are identified on a case-by-case basis, based on their expertise, from among the representatives of each operator/entity involved. The results of the WG's activities are then reported and shared within the Safety Committee and the Safety Review Board. Each activity prepared within the *WG* will be subject to specific follow-up.

2.2.3.o Safety Action Group

Where the complexity of airport operations so requires, the Safety Manager may set up small thematic groups, with members selected from within the Safety Committee. These groups, which are advisory and proactive in nature, pursue their objectives, as specified below, using the strategic guidelines indicated by the Safety Review Board and the observations/assessments of external parties with the most relevant experience and expertise on the subject in question.

The Safety Action Group is a working group chaired by the SM structure, composed of managers, supervisors and operational staff who report to and take strategic directions directly from the Safety Review Board. The main topics dealt with within the SAGs may be:

- Monitoring of operational safety;
- Resolution of identified risks;
- Assessment of the impact on the safety of operational services;
- Ensuring that safety actions are implemented within the agreed timeframes;
- Analysis of the effectiveness of previous recommendations issued.

The results of SAG activities are reported to the SRB, from which it derives directly.

2.2.3.p Post Holder Meeting

The Post Holder Meeting is a meeting held every two months for both airports; it reports and acts on the strategic direction of the items discussed at the SRB; this platform allows the Safety Manager to monitor changes and strategies undertaken at company level.
The meeting is chaired by the Safety Manager, who takes the minutes, and is composed of: the Operations Manager, Maintenance Manager, Infrastructure Post Holder, operations managers and supervisors, depending on the agenda. The topics covered mainly relate to:

- planning of scheduled infrastructure projects;
- scheduled maintenance work;
- the plan for the functional development of the Terminal;
- any layout changes;
- implementation of new operating procedures;
- other airside interventions;
- performance review and follow-up of internal and external surveys;
- Airport Manual update.

2.2.4 Documentation control procedure

AMC1 ADR.OR.D.005 (c) - GM1 ADR.OR.D.OO5 (c)

The Safety & Compliance Monitoring Manager ensures the implementation, evaluation of effectiveness and updating of the chapters relating to the Safety Management System and Compliance Monitoring Management following changes in current legislation, as well as any other contingent changes that require necessary adjustments. He/she is also responsible for informing and training those for whom the chapter is intended on its contents.

The Safety & Compliance Monitoring Manager is responsible for updating, disseminating and archiving the Airport Manual through the record keeping structure within the Compliance Management System.

SEA's SMS maintains a company server within its department dedicated to the archiving and traceability of activities relevant to it; electronic or paper formats are archived in such a way as to ensure protection from damage, alteration and theft.
The company server guarantees:

- One (1) constant backup system every 24 hours;
- Protection against access by unauthorised personnel;
- A minimum retention period of five years, where applicable.

Access to records is permitted to internal and external auditors, the Civil Aviation Authority, other regulatory bodies and/or investigators; If you need to access records within your area of responsibility, please contact the SMS department atsmsdocumentation@seamilano.eu .

2.2.4.a Record Keeping Policy

The Safety Manager is responsible for promoting and communicating a culture based on good record keeping practices within the organisation; each member of the SMS department is required to create, acquire and manage records relating to their activities in an appropriate manner, regardless of their format. Records are stored in suitable conditions and are available for use/consultation at any time, regardless of their format.
The systems used for internal storage (lockers and electronic storage systems) meet the following requirements:

- Protection of integrity and authenticity;
- Appropriate access and use;
- Safety from unauthorised access;
- Storage over time.

2.2.4.b SMS Documentation: document management. General aspects

The system used to store records relevant to each function of the organisation provides for methods defined and structured within the relevant chapters of the Manual; the common system provides for the storage of records in the archives of the individual Functions, with traceability features and collection through specific tools that allow easy retrieval and access to records for all activities subject to Regulation (EU) No. 2018/1139 and related implementing regulations, for the entire required retention period.

It is the responsibility of each Nominated Person to manage and ensure the traceability of the relevant 'records' within their own Department, ensuring their availability, legibility, preservation from alteration, and storage (paper and/or electronic); the retention period starts from when the record was created or modified. Each document must be identified, easily accessible and consultable, so that when a file for a specific activity is accessed, the related supporting documents appear immediately.
The original Airport Certificate and its specifications are kept in the safe located in the president's office; additional electronic copies are kept and stored on the office server belonging to the Compliance Monitoring Manager.

2.2.4.c Documents relating to the Safety Management System

This category includes documents drawn up, managed and archived in relation to the Safety Management System, in particular:

- GSR (Ground Safety Report);
- Safety Promotion (Ground Safety Recommendation; S.I.B.);

- Presentations, minutes and attachments relating to SRB, SC, LRST, SAG and WG;
- Bird Strike Reporting Form and Wildlife Strike Report;
- Risk Assessment;
- Hazard Log;
- Safety Key Performance Indicator (KPI or SPI);
- Safety programme;
- *Event Analysis or Investigation Report*;

The archiving of paper documents, if any, is the responsibility of the Safety Manager's Secretariat, assisted by the various process owners. Each document created and distributed must be identified, easily accessible and consultable. Specifically, the electronic server relevant to the Safety Manager's function is structured into two sub-archives containing specific document storage folders.

Before archiving, the administrative staff of the Secretariat must ensure that the documents are legible; particular care must be taken in both electronic and paper archiving. The following matrix shows the details of the archiving process relating to the Safety Management System.

DOCUMENT	FORM	PAPER ARCHIVING	ELECTRONIC ARCHIVING	DURATION
Hazard Log	Electronic	-	G:\\FileNasLIn\ SMS	10 years
Reporting system alerts	Electronic	-		Unlimited
Risk Assessment	Electronic	At the SM Secretariat		10 years
Investigation reports (*Event Analysis or Investigation Report*)	Electronic	At the SM Secretariat		Unlimited
Safety Information Bulletin	Electronic	-		Unlimited
SC reports	Electronic	-		10 years
LRST reports	Electronic	-		10 years
Emergency Response Reports	Electronic	-		10 years
SRB reports	Electronic	-		10 years
Safety Promotion	Electronic	-		Unlimited
Safety indicators	Electronic	-		5 years
Annual safety report	Electronic	-		5 years

Information reports	Electronic	-		Unlimited
Change Management Form	Electronic	At the SM Secretariat		5 years
Bird Strike Reporting Form	Electronic			5 years
Monthly Bird Strike Reports	Electronic			5 years
Annual reports Bird Strike	Electronic			5 years

2.2.5 Risk management, hazard identification, risk assessment systems

2.2.5.a Safety Risk Management Process

The Safety Risk Management process is a dynamic process carried out within the scope of activities and processes that mainly concern the safety of airside operations. The identification of hazards and subsequent risk management is therefore a process subject to updates, which does not end with the initial identification of the risk. The outline of this process consists of various interconnected and sequential phases. The objective in this area is to reduce the level of risk *to as low as reasonably practicable (*ALARP).

The objective of this process is to identify the risks that may affect the system in order to manage them and bring them to an acceptable level. In this regard, the following definitions are useful for understanding how hazards are managed:

- **HAZARD**: *'condition or an object with the potential to cause or contribute to an aircraft incident or accident"* (ICAO Doc No. 9859 Ed. 4th);
- **THREAT**: *“event or error that occurs beyond the influence of line personnel, increases operational complexity, and which must be managed to maintain safety margins” (ICAO Doc. 9859* Ed. 4th);
- **MITIGATION**: *steps taken to control or prevent a hazard from causing harm and to reduce risk to a tolerable or acceptable level* (EUROCONTROL, ESARR3).
- **RISK:** "*The predicted probability and severity of the consequences or outcomes of a* hazard" (ICAO Doc No. 9859 Ed. 4th).

Risk assessment is therefore based on the objective collection of data relating to the frequency and severity associated with a given *hazard*. Essentially, what characterises this assessment is the method chosen, its consistency, objectivity and reliability. The objectivity and reliability of the result depend directly on the accuracy with which each individual phase is carried out.

Hazards are an inevitable part of air transport; however, their occurrence and possible consequences can be addressed by implementing various mitigation strategies to make the residual risk associated with them tolerable. To this end, the SMS structure uses methodologies that effectively represent the risk, offering the opportunity to identify and assess the main triggers and existing or missing safety barriers, in order to avoid or reduce the harmful effects produced by the event itself.

2.2.5.b Hazard and Threat Identification and Analysis

SEA's hazard identification process is based on findings from the reporting system and auditing activities, which are then discussed using brainstorming techniques within the established safety groups, i.e. a group of industry experts or the Safety Board.
Supported by the experience of its members, as well as by leading international references (ICAO, CAA, EICAST), the Change Management, Documentation, Safety Assessment & Analytics function identifies/consolidates areas subject to risk in airside operations, for which specific hazards have been identified.
The list of identified hazards is therefore divided into categories with reference to the areas mentioned above; these hazard categories are:

- Environmental
- Infrastructural
- Facilities
- Operational
- Handling
- External hazard
- Organisation

Hazards are identified by analysing the phases of the Landing and Take-Off (LTO) cycle; these can be reviewed during the drafting of risk assessments following infrastructural, operational or procedural changes, a process which is accompanied by the identification of new hazards.

In order to better outline the hazards and allow for an update of SEA's Hazard Log, the Change Management, Documentation, Safety Assessment & Analytics function ensures the development

of information flows suitable for the correct and timely reporting of such hazards, in cooperation with the Nominated Persons.
Once this context has been defined, the hazard identification process takes the following aspects into account:

a) Operational activities, both routine and non-routine, of all persons with airside access (including contracted activities and visitors);

b) Infrastructural, procedural/operational and organisational design;

c) Operating procedures and instructions, including related documentation and their adaptation to human capabilities;

d) Communications, including the tools used, terminology and language;

e) Behaviour, skills and other human factors, taking into account medical conditions and any physical limitations;

f) Changes or proposals for change within the organisation;

g) Environmental factors such as ambient noise, vibrations, temperature, lighting and the availability of equipment and PPE;

h) Changes to the Health & Safety at Work management system (environmental, health and safety policy), including temporary changes and their impact on operations, processes and activities;

i) Applicable regulatory obligations;

j) System protections;

k) Trend analysis derived from SPI monitoring, GSR, Audit Compliance findings, Safety Investigation, voluntary reports.

Once **specific hazards** have been identified, the most appropriate **mitigation barriers**, both **preventive** and **protective**, will be identified. These will include, among other things, alert systems and operational responses designed to manage any failures or anomalies, thus ensuring a structured approach to risk prevention and management.
These activities involve the use of internal and external sources:

- **Internal sources:**

  - Voluntary reporting of events;
  - Safety investigations;
  - Audits;
  - Safety monitoring of normal operations;
  - Trend analysis;
  - Feedback from training;
  - Aircraft incident investigations and follow-ups;

- Safety Action Group (brainstorming with a group of experts).

- **External sources:**

  - Aircraft accident reports;
  - Trends in mandatory event reporting;
  - Trends in voluntary reporting;
  - International reports and analyses (EASA, ACI, ENAC, ICAO, etc.).

To identify hazards, SEA uses various techniques and methodologies, selected on a case-by-case basis by those involved in the process based on the operational context and their effectiveness in relation to the analysis objectives. The choice of the most suitable methodology is guided by criteria of relevance, reliability and ability to support informed decisions on safety, including:

- **Brainstorming** with the involvement of a group of experts;

- **HAZOP (Hazard and Operability)** working group aimed at identifying hazards in the management of a work process. These hazards are identified and investigated on the basis of deviations, accidental or otherwise, from key parameters characteristic of the process under consideration. The analysis is conducted through a phase of defining the working environments and understanding the work processes, followed by an examination of the parameters, their deviations and related consequences, in order to record conclusions on possible hazards and recommendations useful for their management. Characteristic of HAZOP are the way the working group operates and the methods used to define the content of the study;

- Use of lists of hazards or causes of danger derived from past experience and knowledge acquired from similar operations. The technique involves the systematic use of an appropriate checklist, verifying the applicability of the individual items to the system under analysis.

- **FMEA (Failure Modes and Effects Analysis)** is a methodology used to analyse the failure or defect modes of a process, product or system. The failure mode is the expression of how the failure or defect manifests itself in the process, while *the effect* refers to the impact of the failure or defect on the process or on the internal/external customer. The first step in the FMEA technique is to break down the process, product or system under examination into basic subsystems. At this point, when analysing the failures of each subsystem, it is necessary to:

  - list all possible failure modes, and for each one:
  - list all possible causes;
  - list all possible effects;
  - list all existing controls (for prevention or detection of failure modes)

- **SWIFT (Structured What-If Technique)** is a simple and effective alternative to HAZOP that involves a multidisciplinary group of experts. Facilitated group brainstorming, typically carried out on a higher-level description of the system, with fewer sub-elements than HAZOP and a reduced set of prompts.

It should also be noted that the Hazard Register is structured as a dynamic system, as the hazard identification process is a continuous and uninterrupted activity; this register is organised in accordance with GM1 ADR.OR.D.005(b)(3) a.5

Specifically, hazard identification and **updating of the relevant register (Hazard Log)** is carried out as follows:

1. SMS convenes the NPs in order to update the hazard log;
2. the SMS structure identifies topics for discussion and prepares the documentation to be used according to the methodology to be applied for the identification of hazards;
3. SMS facilitates NP in identifying all components useful for assessing risks associated with the hazards analysed (threats, barriers, mitigations and consequences);
4. NP use their knowledge and experience to identify the associated risk and minimise the residual risk;
5. SMS processes the documentation produced and aligns the register by updating existing hazards and/or adding new ones if identified;
6. It distributes the hazards entered and/or updated to the NPs involved in the process for approval;
7. SMS updates the hazard log review.

The Hazard Log is updated (if necessary) after each risk assessment has been drafted.

2.2.5.c Risk Assessment and Mitigation

Hazard analysis allows the associated risk level to be assessed and the appropriate mitigation/improvement measures to be identified. The purpose of this analysis is to provide a description of the causes and consequences of the hazard and of the preventive and/or mitigating processes and procedures put in place for that hazard. Starting from the elements that emerge from the process of identifying and analysing the components of the system, a matrix is used in which risk is associated with ***the probability*** of an event occurring and its ***severity*** if it were to occur, according to the model reported in ICAO Doc No. 9859.

The hazards identified are managed through continuous monitoring. The priority for updating risk assessments using the bow tie method, described below, is based on the critical issues identified by the entire organisation through the reporting and auditing system or on requirements related to significant changes.

The process, based on the bow-tie methodology, can be summarised in the following stages:

Stage 1 – identification of the Undesirable Operational State (UOS)

The first stage consists of identifying the undesirable event in relation to the hazard, i.e. the stage in an accident scenario where the scenario has reached the point where the accident can be avoided thanks to effective mitigation barriers.

Stage 2 – Identification of threats
The identification of threats consists of assessing all potential contributing factors, such as conditions, activities, and procedures, that could lead to the occurrence of the UOS.

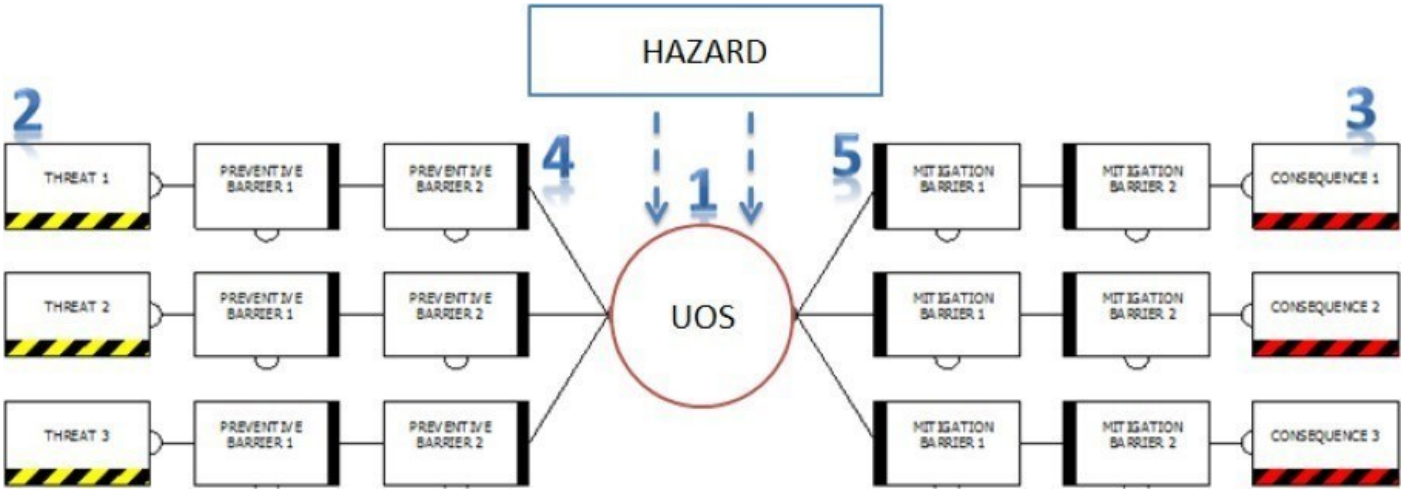
Phase 3 – Identification of consequences (Consequence)

Identifying consequences involves assessing potential injuries to staff or passengers, damage to vehicles, equipment or infrastructure, and inability to perform a specific function as a result of the UOS. As part of the SMS activity, identifying consequences involves, where possible, researching the types of occurrences related to the hazard. These occurrences are, in fact, usually the consequences of the UOS identified for each hazard.
By processing the data in the SMS archive, it will be possible to report in this section the number of events, their types and the severity recorded. The data may be supplemented with the assessments of the investigations carried out and with the distribution of the types of causes found for these events. In analysing the occurrences, account will be taken not only of individual events but also of their temporal distribution and therefore their trend; the subsequent risk assessment will refer precisely to this data.

Phases 4 - 5 - Identification of barriers

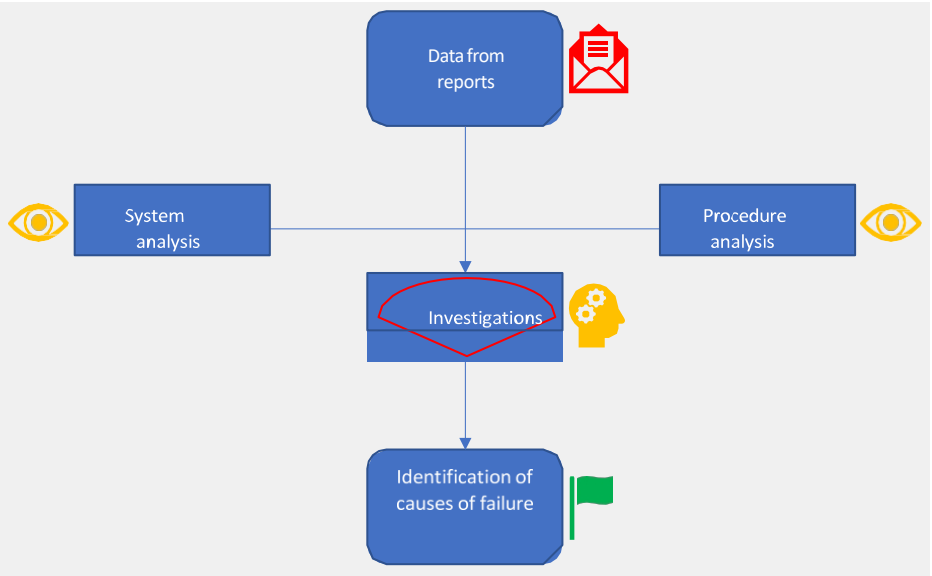
Barriers can be *preventive* or *mitigating*; the former constitute a control element aimed at reducing the possibility of the UOS occurring in the face of a specific threat. The latter constitute a mitigating element of the possible consequences of the UOS; in general, barriers can usually be assimilated to processes and/or procedures.
In order to assess their effectiveness, this section may include audits and/or inspections carried out on entities/processes and any findings that emerged, indicating completion times and/or any deadlines that were not met. The graphical representation of the findings of this analysis phase, subject to the technique used for risk assessment, allows the elements relevant to the identified hazard to be visualised and forms the basis for risk assessment. The analysis phase is carried out and coordinated by SMS personnel with the involvement of experienced professionals from within or outside SEA. As part of this analysis, the 'Risk Assessment' document is compiled, as described in the relevant paragraph.

If the threats and consequences are limited in number, making their representation in *bow-tie* form extremely simplified, they will not be included in the risk assessment.



2.2.5.c.1 Retrospective analyses

These are aimed at analysing events that have already occurred; they are used to carry out an in-depth assessment of the circumstances that occurred, with the aim of finding the fundamental reasons and causes that led to them, as well as the effects they had on the system and the frequency of occurrence; the aim is to prevent such events from happening again.



GSR reports serve as a reference basis for identifying the conditions, events or circumstances that have led to or could contribute to the occurrence of situations

unwanted or unexpected, with the consequence of reducing the system's ability to perform a specific function. To this end, for each event reported with GSR, the SMS function performs the following actions:

- activation of the process of analysis and classification of the severity of the event;
- classification of the event as: *event, incident, serious incident, accident;*
- possible initiation of investigations to determine the causes of the event;
- drafting of *an Event Analysis or Investigation Report* containing information relating to

the event and th , as detailed in § 2.2.8.b.

The overall reporting system is supported by monitoring activities carried out by SMS staff. These monitoring activities analyse the main safety contexts on the airside, the correct use of GSE, and compliance with general rules. The topics on which the results of these activities are developed can be summarised in three main areas of intervention: **maintenance; behavioural; infrastructural**. The sources used for this type of analysis are as follows:

➢ **Internal sources:**
- GSR reports;
- Interviews with personnel involved;
- Monitoring;
- Analysis of event trends;
- Investigations and follow-ups of the event;
- Local Runway Safety Team and other WGs.

➢ **External sources:**
- Aircraft accident inquiries and investigations;
- Mandatory reports to authorities;
- Voluntary reports to authorities.

The analysis takes into account the calculation of *probabilities (p)* and *severity (s),* according to the following parameters:

- Probability: calculated as the frequency of occurrence of a given event;
- Severity: classified according to the actual effects that the event had on the system.

2.2.5.c.2 Prospective analyses

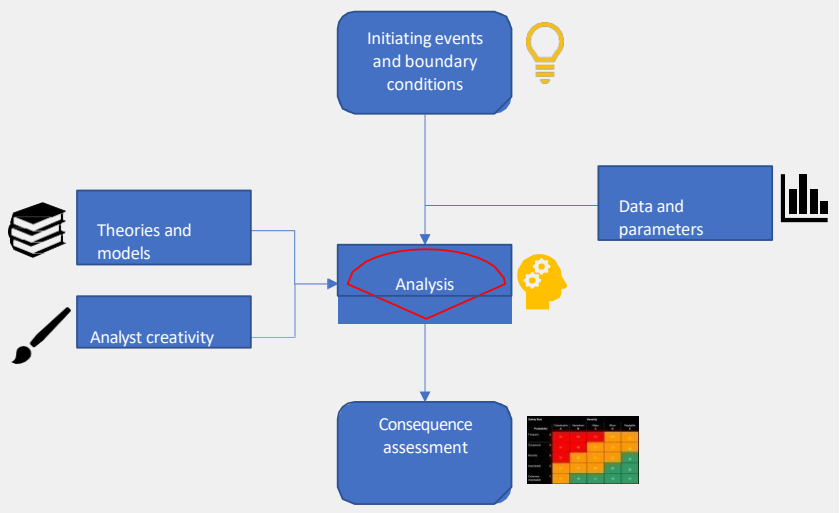
These are based on a probabilistic study that considers all available elements (databases) to define a prevention activity based on the possibility of the risk occurring. They are used to carry out risk assessments concerning possible cases that have not yet necessarily occurred within the reference system.
In this case too, internal and/or external sources are used in order to obtain details of a *quantitative* and to be able to study the causes and effects of possible safety events:

- **Internal sources:**
  - GSR reports;
  - Surveys;
  - Compliance audits;

- Monitoring;
- Event trends and SPI;
- Collaboration with Training Shared Services and any feedback;
- Field tests;
- Follow-up.

- **External sources:**
  - Air accident inquiries and investigations;
  - Literature on analysis and assessment methods;
  - Mandatory reporting to authorities;
  - Voluntary reports to authorities.

The methodologies used in the risk assessment process are those most commonly found in the literature (event tree, fault tree, ERC, Bow-Tie, etc.).



2.2.5.c.3 Risk acceptability

Risk assessment is carried out with the support of qualified experts in the area of interest; if the consequences of an event identified during the analysis phase can be traced back to occurrences recorded in the reporting system, the risk assessment carried out will take into account the severity and frequency data processed by the SMS; if, on the other hand, there are no occurrences directly attributable to the identified consequence, the risk assessment will be ***qualitative,*** obtained from a joint analysis based on the parameters of the matrix shown below. In any case, the principle underlying the assignment of severity and probability is to refer to ***the 'most credible outcome***'. In particular, the risk assessment and mitigation process is implemented through analysis (in terms of *probability and severity)*, evaluation (in terms of *tolerability)* and control (in terms of mitigation). Once the **hazard** analysis and assessment phase has been completed**,** having thus defined **threats, consequences and barriers,** the risk assessment is carried out for the consequences identified in the analysis phase; the risk level is then assigned on the basis of the risk matrix set out in §2.2.5.2.

The Risk Assessment Matrix (RCM) used classifies each case into one of three levels based on the assessed risk: low (acceptable without revision); medium (acceptable with revision); high (unacceptable), in the following matrix:

Safety Risk		*Severity*				
Probability		*Catastrophic A*	*Hazardous B*	*Major C*	*Minor D*	*Negligible E*
Frequent	5	5A	5B	5C	5D	5E
Occasional	4	4A	4B	4C	4D	4E
Remote	3	3A	3B	3C	3D	3E
Improbable	2	2A	2B	2C	2D	2E
Extremely improbable	1	1A	1B	1C	1D	1E

Risk acceptability matrix

Following the classification of the risk, consequent actions are envisaged, as shown below:

UNACCEPTABLE RISK: the operation is promptly interrupted or reduced; specific strategies are studied with the aim of reducing the risk to a minimum level by improving existing barriers or adding new ones.

TOLERABLE RISK: the operation can be carried out by introducing additional mitigations to reduce the level of risk.

ACCEPTABLE RISK: The risk is acceptable; monitoring is planned to verify that the efficiency of the existing barriers remains at optimal levels.

The risk assessment is then updated if one of the following situations occurs:

- significant or abnormal increase in reports of events related to the hazard identified hazard;
- significant ineffectiveness of preventive or mitigating barriers related to the hazard;
- significant organisational, infrastructural and procedural changes relating the identified hazard;

The analyses take into account the calculation of *probabilities (p)* and *severity (s),* according to the following parameters:

PROBABILITY:
In order to assess the probability of a consequence occurring, indicative parameters are defined which may refer to recorded or presumed frequencies.

PROBABILITY – DEFINITIONS				
Extremely Improbable	**Unlikely**	**Remote**	**Occasional**	**Frequent**
Extremely rare event or almost never occurring . Approximately in the order of once every 10 years	Rare or remote event with very low frequency Approximately once every 5 years	Event unlikely to occur, but possible. Approximately once every year	Event likely to occur a few time. Approximately in the order of once a month	Event expected to occur frequently. Approximately more than once a month

Within the *probability* calculation analysis, the following elements could be considered: Human Factor; Failure Rate; Generic Event.
The "recorded frequencies" are determined by the frequency with which an event equal to or similar to the consequence under consideration has occurred.

SEVERITY:
In order to assess the severity of a consequence, an RCM is used, based on the criteria set out in ICAO Doc 9859; it classifies the *severity* of each case into one of three levels based on the assessed risk: low (acceptable without revision); medium (acceptable with revision); high (unacceptable).

The *tolerability* of the residual risk is the responsibility of the owner of the process or change to which the hazard is linked. However, in situations that could lead to operational penalties or significant investments for the adoption of corrective actions, the decision must be taken after obtaining the opinion of the Safety Review Board, chaired by the Accountable Manager.

2.2.5.d.4 Criteria for estimating SEVERITY and PROBABILITY (frequency)

With regard to ***probability*** classes, reference has been made to the provisions of Guideline 2021/001-GEN, as set out below:

Likelihood	Meaning [3]	Frequency	Probability	Airports
Frequent	*Likely to occur many times (has occurred frequently)*	More than once per week	Probability of occurrence per operation/operational_hour equal to or greater than $1x10^{-3}$	Expected to occur more than once per week or every 2500 departures, whichever occurs sooner
Occasional	*Likely to occur sometimes (has occurred infrequently)*	Expected to occur about once every month	Probability of occurrence per operation/operational_hour less than $1x10^{-3}$ but equal to or greater than $1x10^{-5}$	Expected to occur about once every month or 250,000 departures, whichever occurs sooner
Remote	*Unlikely to occur, but possible (has occurred rarely)*	Expected to occur about once every year	Probability of occurrence per operation/operational_hour less than $1x10^{-5}$ but equal to or greater than $1x10^{-7}$	Expected to occur about once every year or 2.5 million departures, whichever occurs sooner
Improbable	*Very unlikely to occur (not known to have occurred)*	Expected to occur once every 10-100 years	Probability of occurrence per operation/operational_hour less than $1x10^{-7}$ but equal to or greater than $1x10^{-9}$	Expected to occur once every 10-100 years or 25 million departures, whichever occurs sooner
Extremely Improbable	*Almost inconceivable that the event will occur*	Expected to occur less than every 100 years	Probability of occurrence per operation/operational_hour less than $1x10^{-9}$	Expected to occur less than every 100 years

Given the type of data available, which is not parameterised according to 'operational hours', the 'Frequency' column is mainly used, adapting it to the actual movements recorded at Linate and Malpensa airports. Therefore, the following procedure is followed:

With regard to the **probability** table, five classes (5) are considered, to which a numerical reference value has been assigned that converts the concept of frequency into probability. This value was calculated by considering the movements *(including commercial aviation and general aviation)* of the last 10 years at each of the two airports and the number of weeks or months in that period.
For the sake of completeness, a demonstrative example of the calculations developed is provided below.

Considering case P5 - Frequent:

- this corresponds to an event frequency of≥ once a week;
- 10 years count as 520 weeks;

*The corresponding **probability** is calculated considering:* $\frac{1}{(somma\ mov.\ 10anni)}$

Given the dependence on the previous 10 years, the probabilities are updated on an annual basis. Applying the above, we obtain the probability tables calculated for each airport:

FREQUENCY/PROBABILITY TABLE LIN

Level	Categories	Definition	Numerical Numerical	Average
P1	Extremely Improbable	≥ Once every 100 years	9.00E-08	4.95E-07
		< Once every 10 years	9.00E-07	
P2	Improbable	≥ Once every 10 years	9.00E-07	4.95E-06
		< Once a year	9.00E-06	
P3	Remote	≥ Once a year	9.00E-06	5.85E-05
		< Once a month	1.08E-04	
P4	Occasional	≥ Once a month	1.08E-04	2.88E-04
		< Once a week	4.68E-04	
P5	Frequent	≥ Once a week	4.68E-04	4.68E-04

FREQUENCY/PROBABILITY TABLE MXP

Level	Categories	Definition	Numerical Numerical	Average
P1	Extremely Improbable	≥ Once every 100 years	5.44E-08	2.99E-07
		< Once every 10 years	5.44E-07	
P2	Improbable	≥ Once every 10 years	5.44E-07	2.99E-06
		< Once a year	5.44E-06	
P3	Remote	≥ Once a year	5.44E-06	3.54E-05
		< Once a month	6.53E-05	
P4	Occasional	≥ Once a month	6.53E-05	1.74E-04
		< Once a week	2.83E-04	
P5	Frequent	≥ Once a week	2.83E-04	2.83E-04

With regard to **severity**, the reference table corresponds to that proposed by ICAO Docs 9859 and 9981; the latter serves as a basic reference, providing examples of which severity class can be assigned to each consequence under consideration.

*Quantitative/qualitative **severity** table (source: ICAO Doc No. 9859)*

Severity	*Meaning*	*Value*
Catastrophic	• Aircraft / equipment destroyed • Multiple deaths	A
Hazardous	• A large reduction in safety margins, physical distress or a workload such that operational personnel cannot be relied upon to perform their tasks accurately or completely • Serious injury • Major equipment damage	B
Major	• A significant reduction in safety margins, a reduction in the ability of operational personnel to cope with adverse operating conditions as a result of an increase in workload or as a result of conditions impairing their efficiency • Serious incident • Injury to persons	C
Minor	• Nuisance • Operating limitations • Use of emergency procedures • Minor incident	D
Negligible	• Few consequences	E

Finally, probability and severity analysis allows **the risk attributable** to each consequence analysed **to be identified**. The combination of a number (probability range) and a letter (severity range) determines the class to which the risk belongs, as shown in the table below**:**

Tolerability matrix (source: ICAO Doc No. 9859)

Safety Risk Index Range	*Safety Risk Description*	*Recommended Action*
5A, 5B, 5C, 4A, 4B, 3A	INTOLERABLE	Take immediate action to mitigate the risk or stop the activity. Perform priority safety risk mitigation to ensure additional or enhanced preventative controls are in place to bring down the safety risk index to tolerable.
5D, 5E, 4C, 4D, 4E, 3B, 3C, 3D, 2A, 2B, 2C, 1A	TOLERABLE	Can be tolerated based on the safety risk mitigation. It may require management decision to accept the risk.
3E, 2D, 2E, 1B, 1C, 1D, 1E	ACCEPTABLE	Acceptable as is. No further safety risk mitigation required.

2.2.5.e Criterion for estimating HF incidence - TESEO

For the purposes of human factor analysis, the SEA SM uses a technique called 'TESEO' (Empirical Technique for Estimating Operational Errors), which studies the incidence of *human factors* in risk analysis on systems and in control rooms. It is a typical example of an index model that is simple and immediate to apply, geared towards assessing the probability of operator error.

This probability of failure is calculated as the product of five "error probability parameters" (Ki), each characterising an aspect of the system.

Operator error probability= r K1 x K2 x K3 x K4 x K5.

Where:

- **K1** Factor relating to the type of activity (routine or extraordinary); if the activity is habitual for the worker, the probability of a possible error tends to decrease.
- **K2** Time stress factor linked to the time needed to perform the activity; less time available causes an increase in stress, which translates into a greater risk of accident.
- **K3** Operator experience and training factor; greater work experience leads to a drastic reduction in the possibility of error.
- **K4** Anxiety factor related to the activity depending on the work situation, a serious emergency, a potential emergency or conditions that are not actual but possible.
- **K5** Factor that takes into account the environmental conditions and ergonomics of the equipment and apparatus with which the worker comes into contact.

Below are extracts from the tables with the factor values for the application of the model.

TESEO tables

K1	TIPO DI ATTIVITA'	Routine semplice		0,001
		Routine complessa		0,01
		Non routine		0,1
K2	TEMPO A DISPOSIZIONE	Routine	> 20 secondi	0,5
			10 secondi	1
			2 secondi	10
		Non routine	> 60 secondi	0,1
			45 secondi	0,3
			30 secondi	1
			3 secondi	10
K3	CARATTERISTICHE OPERATORE	Molto esperto		0,5
		Mediamente esperto		1
		Poco esperto		3
K4	SITUAZIONE OPERATIVA	Normale		1
		Potenzialmente di emerg.		2
		Di emergenza		3
K5	CONDIZIONI AMBIENTALI	Ottime		0,7
		Buone		1
		Discrete		3
		Cattive		7
		Pessime		11

2.2.5.f Safety Assessment Template

The standard template for a safety assessment is as follows:

1. Introduction	**Table with general classification of the modification/intervention.**
1.1 Purpose of the study	Explanation of the purpose of the document
1.2 Applicable regulations	Table containing thereferences applicable applicable to risk assessment, site boundaries and intervention.
1.3 Subject and purpose of the analysis	Explanation of the purpose of the document and the type of change applicable.
1.4 Document revision (trigger)	Revision matrix.
1.5 Summary table of safety requirements	Summary of issues considered potentially critical in terms of safety.
2. Description of the system	Detailed description of the intervention and the schedule of work.
3. Assessment methodology	Methodologies used to identify hazards, analyse and related calculation.
4. Hazard identification	Identification of hazards introduced or modified by the intervention specifying: • Owner • Type of hazard • Hazard name • Identification code
5. Risk analysis	Use of methodologies for the development of qualitative and/or quantitative analysis quantitative analysis of the effects of the change on the system.
5A. Initial change risk analysis (if applicable)	Development of the analysis with identification of: • Undesirable event • Threats • Barriers • Consequences
5.A.(i) Calculation of change risk	Calculation of the initial risk value PxS for the consequences arising from hazard (i).
5B. Analysis of the initial construction site risk (if present)	Development of the analysis with identification of: • Undesirable event • Threats • Barriers • Consequences
5.B.(i) Calculation of construction site risk	

	Calculation of the initial risk value PxS for the consequences resulting from hazard (i).
6. Risk mitigation measures	Use of methodologies for the development of qualitative and/or quantitative analysis quantitative analysis of residual risk following any mitigation actions.
6A Analysis of residual change risk (if any)	Calculation of the residual risk value PxS.
6B. Analysis of residual construction site risk (if present).	Calculation of the residual risk value PxS.
7. Conclusions	Final considerations on the feasibility of the intervention.
8. Appendices	List of annexes

If the safety assessment only concerns airside construction activities *(aerodrome works)*, does not constitute a formal change and does not introduce new hazards compared to those already present in the hazard log, a more operationally oriented version of the document may be adopted. This version, which is an alternative to the *standard* template provided in the SMS Manual, ensures greater usability and flexibility of use, in line with the typical variability of construction activities, while maintaining consistency with the principles of the safety management system. The simplified format template to be used in the cases described above is provided below.

1. Summary table of safety requirements	**Summary of issues considered potentially critical in terms of safety**
2. Description of the activity	Detailed description of the intervention and the work schedule.
3. Identification and analysis of hazards	Methodologies used for hazard identification, risk analysis and related calculation. Identification of hazards identified among those listed in the Hazard Log. Summary of the elements identified for risk analysis, namely: • Undesirable event • Barriers • Consequences with relative probability and severity Visualisation of the final risk on the risk matrix
4. Conclusions	Final considerations on the feasibility of the intervention

2.2.6 Monitoring the effectiveness of safety actions and risk mitigation measures

AMC1 ADR.OR.D.005 (b) (4) - GM1 ADR.OR.D.005 (b) (4)

As safety is by definition a dynamic element, its management requires continuous review of risks and the resulting mitigation actions, in order to maintain the right balance between airport operations and protection, i.e. the safeguarding of safety.

To this end, the Airport Safety function develops and maintains a formal Safety Risk Assessment and Risk Mitigation process (ref. § 2.2.5), which ensures the analysis (in terms of ***probability*** and ***severity*** of events), evaluation (in terms of ***tolerability***) and control (in terms of ***mitigation***) of risks. in this context, the risk assessment process leads to the identification of ***preventive or corrective*** actions that are concretely established and implemented by the relevant functions (Safety Manager and Nominated Person).

The SMS system implemented by SEA is constantly monitored and reviewed with a view to its continuous improvement, as an objective and an essential part of ensuring safety, through periodic review activities based on the following elements:

A. Implementation and review of a Safety Policy and Safety Performance Indicators;

B. Analysis confirming the effectiveness of the corrective actions introduced, through monitoring activities carried out by *Safety Observation Agents*, in order to intervene where deemed necessary; the Safety Services Office at the airport is responsible for examining and supervising these activities in order to maintain constant attention and ensure an adequate and timely response when necessary;

C. Analysis of GSRs (where events that have occurred are correlated with the mitigation action implemented);

D. Audit activities conducted by the CMM structure, with the aim of assessing their effectiveness in terms of safety and identifying weaknesses.

Following these processes, the Change Management, Documentation, Safety Assessment and Analytics function updates the Hazard Log, integrating any new hazards or threats that may be identified.

On an annual basis, the Change Management, Documentation, Safety Assessment and Analytics function reviews the Hazard Log in order to deactivate any hazards that are no longer applicable or suspended. This process is shared with the NPs to which the hazards relate during the PH Meeting.

The various types of monitoring covered by the Airport Safety staff are listed below, highlighting the related issues under consideration.

TYPE OF MONITORING	DESCRIPTION OF ACTIVITIES
FUEL REFUELLING	Verification of *refuelling* processes in accordance with the operating procedure contained in the MDA (ref. Chapter 15).
AIRCRAFT ARRIVAL	Verify arrival processes at the stand assigned to the aircraft, in accordance with the instructions contained in the Airport Handling Manual.
DEPARTURE/LOADING OF AIRCRAFT	Verify assistance processes carried out at the stand during the preparation of the aircraft for departure.
STAND ORDER AND CLEANING (HOUSEKEEPING)	Verify compliance with processes prior to aircraft arrival, in accordance with the provisions of the Airport Handling Manual.
SPEED ON THE APRON	Speed checks carried out with inspections in areas identified on the airport plan as critical for traffic.
MONITORING	Aimed at analysing/monitoring specific issues relating to airport operations, including the management of risks associated with activities and the subsequent collection of observations/assessments.
FIRE EXTINGUISHERS	Actions aimed at checking the functionality and compliance with airport procedures relating to emergency devices connected to fire risk and the resulting observations/assessments.
FOD	Useful for photographing the state of aprons in the presence of any debris, assessing the extent of the potential danger. Any FOD must be removed directly where possible.

The Safety Management System also promotes the dissemination of actions originating from ENAC at national level, disseminating them through Safety Recommendations or Safety Bulletins or, where deemed appropriate, by convening Safety Committees and working groups.

2.2.7 Monitoring of Safety Indicators

AMC1 ADR.OR.D.005 (b) (5) - GM1 ADR.OR.D.005 (b) (5) - AMC1 ADR.OR.D.005 (b) (7) - GM1

Safety Performance Monitoring is the process by which SEA verifies the actual level of safety in accordance with the policy adopted, as well as with respect to the objectives set, the risks and the measures taken.

mitigation measures identified to ensure safety. This process includes the definition of Safety Performance Indicators (SPI) and performance targets (ref. ICAO Doc 9859 – App. 4 Ch. 4 Table 4-A4-2: *Safety Performance Indicators for aerodrome operators)*, presented by the Safety Manager, discussed and approved annually during the Safety Review Board, as well as the criteria by which they are measured. It is based on the identification of SPI performance indicators, the definition of specific annual targets, and subsequent monitoring activities. The purpose of this chapter is therefore to describe:

- the formal process adopted to develop and maintain the set of SPIs;
- how the annual SPI target levels are defined;
- the process adopted for performance monitoring.

To identify and define objectives, the SMS relies on an internal review of the Management System (SMS-CMM), which includes the following elements:

- results emerging from auditing activities;
- industry statistics;
- corrective actions taken and their effectiveness;
- reports on contingency and emergency situations (real or simulated ERPs);
- assessments of overall SMS performance;
- techniques adopted for hazard identification, risk assessment and risk management
- future objectives.

2.2.7.a Safety Performance Indicator (SPI)

SPIs are a series of management and control parameters that provide concise and objective information on the culture of reporting aviation events to Safety Management and on the safety levels of airside operations. In a preliminary phase, they can provide useful indications for identifying any critical issues, which are then subject to further specific investigation.

They are therefore a useful tool for identifying any critical issues, which are then subject to subsequent specific investigations.
SPIs are identified annually on the basis of internationally recognised parameters, as well as experience gained in the field of SMS. These indicators are shared within the company at the Safety Review Board.

Identification and maintenance of SPIs

The indicators, identified annually, mainly concern the safety levels of airside operations; the statistical processing of SPIs is carried out using data from the reporting system database or data traceable in the SM systems. The following table shows the selected indicators, which are shared annually in the Safety Review Board; their performance is presented quarterly to Top Management at the Safety Review Board or Safety Action Group.

SAFETY PERFORMANCE INDICATOR				
No.	**SPI**	**DESCRIPTION**	**FORMULA**	**OWNER**
1	**DAMAGE A/M**	Damage to aircraft in motion or parked (excluding damage related to technical causes or bird strikes).	Ratio between the number of reports of damage to aircraft and the number of aircraft movements, per 10,000 aircraft movements	OPS Manager Maintenance Manager
2	**GROUND COLLISION**	Collision occurring while an aircraft is taxiing to or from the runway in use.	Ratio between the number of reports of ground collisions per year and the number of movements per year, per 10,000 movements per year	OPS Manager Maintenance Manager
3	**RUNWAY INCURSION (**)**	Incorrect presence of aircraft, vehicles, persons in the runway protection area of the runway	Ratio between the number of runway incursion events and the number of aircraft/vehicle movements, per 10,000 aircraft/vehicle movements	NP
4	**A/M INTERFERENCE DURING TAXIING, PUSHING AND STANDING**	Failure to give way aa/mm	Ratio between the number of reports of failure to give way per AA/MM and the number of movements per AA/MM, per 10,000 movements per AA/MM	OPS Manager Maintenance Manager PH Design
5	**DAMAGE O A/M from FOD**	Damage to aircraft caused by FOD	Ratio between the number of FOD reports in the movement area and the number of aircraft movements, per 10,000 aircraft movements	Safety Manager
6	**BRI 2 (*)**	Bird Strike Risk Index (BRI)	Please refer to Annex 6 of ENAC Circular APT-01 B	OPS Manager
7	**Safety Reporting Culture**	Reporting culture among Airport Community personnel (SEA and third parties)	Ratio between the difference in the number of reports received by SEA and the number of reports involving damage/injuries/runway incursions incursions received by SEA compared to the number of movements, multiplied by 1000	Safety Manager
8	**DAMAGE TO AIRPORT RESOURCES**	Event relating to damage to airport resources and flight infrastructure	Ratio between the number of events involving damage to airport resources and the number of aircraft movements per month, per 10,000 aircraft movements per month	Safety Manager
9	**COLLISION BETWEEN RAMP VEHICLES**	Road accidents involving airport vehicles and/or operators	Ratio between the number of reports of road accidents involving airport vehicles and/or operators and number of aircraft movements per month, per 10,000 aircraft movements per month	Safety Manager

(*) The Birdstrike Risk Index (BRI 2) is reported in the Annual Birdstrike Report (ref. ENAC APT-01B par. 5.2).

(**) Data on runway incursions is provided by ENAV as part of the Local Runway Safety Team

2.2.7.b Definition of SPI targets

In line with its Safety Policy, SEA's overall objective is to contribute to the continuous improvement of the identified safety indicators. Each year, during the first SRB, the numerical targets for the SPIs are defined; during the Safety Review Board and/or SAG meetings, trends are presented in order to identify new mitigation measures where necessary.

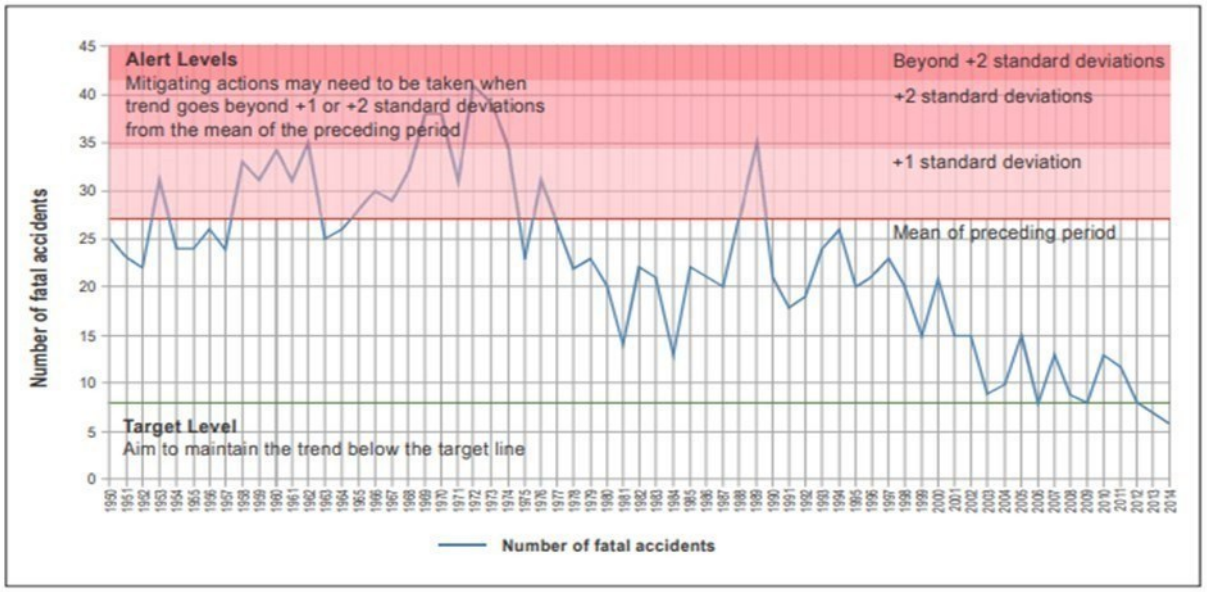
2.2.7.c SPI monitoring

In order to periodically monitor SPI trends, Alert Levels are defined; these allow trends and the type of actions necessary to address the trend of a given SPI to be determined; they are defined by the standard deviation (SD) from the average of the data considered. Specifically, the ICAO Safety Management Manual (SMM) defines two Alert Levels, determined by the following data:

- **First Alert Level:** average of data prior to the period under review+ 1*SD;
- **Second Alert Level**: average of data prior to the period under review + 2*SD. Once these

thresholds have been defined, three zones can be identified, defined as follows:

- **Zone 1**: between the line representing the average of the data prior to the period under review and the first Alert Level;
- **Zone 2**: between the first and second Alert Levels;
- **Zone 3**: above the second Alert Level.



As reported in the ICAO SMM, mitigative actions are considered *necessary* when the SPI trend exceeds the first and/or second Alert Level, starting from the average line. Furthermore, the zone in which the SPI trend falls will determine the urgency of intervention (the higher the number associated with the zone, the greater the urgency).

Any alerts recorded constitute *'early* warnings' that allow for early intervention in advance, thereby increasing safety performance.

2.2.8 Reporting System and related investigations

ADR.OR.C.030 - AMC1 ADR.OR.C.030 - ADR.OR.D.035 - AMC1 ADR.OR.D.035 - AMC2 ADR.OR.D.035 - GM1 ADR.OR.D.035(b)

One of the key elements of the Safety Management System is the Reporting System. The Ground Safety Report (GSR) system adopted by SEA ensures integration between spontaneous and mandatory reports. Each of the reported events – mandatory and non-mandatory – is managed individually by SMS; the relevant information collected is transmitted to the competent authorities where required (ref. § 2.5 of the MDA). In the analysis conducted by SMS

- through the *Occurrence and Safety Investigation* function (see previous paragraph 2.2.3) - a complete screening of the reports received is always carried out, with a view to improving aviation safety. This analysis is carried out with the aim of identifying immediate and latent hazards, developing and adopting appropriate preventive and/or corrective measures.

The final analysis of events can produce informative and procedural output, which is communicated and disseminated to all airport operators within the various periodic committees set up to deal with safety at the airport (e.g. Safety Committee).

This involvement and feedback on the outcomes of reports encourage and raise awareness among people to report events, facilitating the exchange of information relevant to aviation safety. Under no circumstances will reports be used by SMS to assign blame or liability, in accordance with the principle of *Just Culture*. Information relating to reports is used exclusively for the purpose of identifying risks and related actions aimed at improving aviation safety. To this end, it is essential to establish a relationship of trust between the informant and the function responsible for collecting and evaluating information, with strict application of the regulations in force regarding confidentiality. In fact, the transmission of data and/or personal information that could lead to the informant or other persons mentioned in the reports is limited.

Experience has shown that accidents are often preceded by safety-related incidents and/or deficiencies that reveal the existence of potential safety hazards. All information relating to safety issues is therefore an essential resource for identifying actual or potential hazards to aviation safety. This also makes it possible to take appropriate safety measures based on the information provided. It has also been found that purely reactive systems have a limited effect on the possibilities for improving safety; therefore, such reactive systems can be effectively enriched and supplemented by proactive systems that use other types of information in order to bring about real improvements.

The procedures for reporting events classified as *Mandatory* in civil aviation to the competent authorities are also reported together with voluntary reports pursuant to EU Reg. No. 376/2014. This section of the SMS Manual contains a description of the reporting system adopted by the Manager's organisation through the GSR, as well as the subsequent procedures implemented by the management company on the investigations and analyses conducted following the reported events.

Any other third-party organisation operating in the airport sector is also required to submit MOR notifications within its area of competence, as indicated in EU Regulation No. 376/2014. In addition to mandatory reporting, SEA has established a Voluntary Reporting System pursuant to Article 5 of EU Regulation No. 376/2014; reports may be generated on a voluntary basis for safety purposes, beyond the cases and mandatory subjects established by the regulation.

2.2.8.a Reporting System

Without prejudice to the obligations set out in Regulation (EU) No. 376/2014, personnel and any organisation operating airside must report any aeronautical event occurring airside that could pose a risk to the safety of operations to SEA's Safety Management System by means of a Ground Safety Report (GSR). The information received is collected, recorded, analysed and used solely to maintain or improve the safety of operations and not to assign blame or responsibility. From the processing and analysis of the data received, the Safety Manager can deduce trends in airport safety performance and obtain adequate feedback on the performance of the system as a whole.

The GSR form is accessible to everyone and available in both Italian and English in two formats: a PDF format, which can be downloaded free of charge, and a similar HTML format, which can be completed directly online via a dedicated link for each airport, by registering on the following web pages:

- for **Malpensa**: https://mrs.seamilano.eu/mrs-sea/ap/limc/gsr.html

- For **Linate**: https://mrs.seamilano.eu/mrs-sea/ap/LIML/gsr.html

Reports can also be sent in other ways: SMS has set up the email addresssms@seamilano.eu , as well as special yellow SMS boxes located at Gate 1 in Linate and at the staff canteen in Malpensa. Reports can be submitted in paper form inside these boxes.

Each type of event has a GSR classification code, as indicated and suggested in the form itself, in the drop- down menu in the mandatory field. All of the above reporting methods can also be used anonymously.

Mandatory Reports

Any event that has resulted in damage (injury to persons, damage to aircraft, vehicles, infrastructure) or that has compromised the safety of airside operations must be reported to SMS within 72 hours of the event, without prejudice to the need to promptly communicate any

occurred to SEA MCR-AOCC for operational management. For further information and a complete list of mandatory reports, please refer to Reg. (EU) No. 2015/1018 (Annex IV).

AIRCRAFT- AND OBSTACLE-RELATED OCCURRENCES	
1	Collision or near collision on the ground or in flight, with an aircraft, the ground or an obstacle.
2	Impact with wildlife, including birds
3	Runway excursion
4	Runway or Taxiway Actual/potential incursion
5	FATO Incursion or Excursion
6	Failure of an aircraft or vehicle to comply with authorisation, instructions or restrictions while operating on an airport movement area (e.g. *error on the runway, taxiway*)
7	FOD present in the movement area that has or could have endangered the aircraft and its occupants or any other person.
8	Presence of obstacles at or near the aerodrome that are not listed in the AIP or NOTAMs and/or are not adequately marked or illuminated.
9	Interference with push-back, power-back or taxiing by vehicles, equipment or persons.
10	Passengers or unauthorised persons left unattended on the apron.
11	Jet blast, down wash, effect due to propeller rotor flow
12	Emergency declaration ('MAYDAY' or 'PAN')
DEGRADATION OR TOTAL INTERRUPTION OF SERVICES OR FUNCTIONS	
1	Interruption or malfunction of communications between: a) airport, vehicle or ground personnel and air traffic services units or apron management service units b) apron management service unit and aircraft, vehicle or air traffic services unit
2	Failure, malfunction or significant technical defect relating to airport equipment or systems that endangered or could have endangered the aircraft or its occupants.
3	Significant deficiencies in airport lighting, marking or signage
4	Failure of the airport emergency alarm system
5	Rescue and firefighting services not available as required by applicable requirements
OTHER EVENTS	
1	Fire, smoke, explosions in the vicinity or in airport facilities that endangered or could have endangered the aircraft and its occupants or any other person
2	Events related to airport security (e.g. illegal entry, acts of sabotage, bomb threats)
3	Failure to report a significant change in airport operating conditions that endangered or could have endangered the aircraft and its occupants or any other person
4	Missing, incorrect or inadequate de-icing/anti-icing treatment
5	Significant fuel spillage (>20 square metres) during refuelling operations
6	Loading of contaminated or unsuitable fuel or other contaminated or unsuitable essential fluids (including oxygen, nitrogen, lubricants and drinking water)
7	Poor runway surface conditions.
8	Any event in which human performance contributed directly or could have contributed to causing an accident or serious incident.

2.2.8.b Investigation activities

Every event reported to the SMS structure (whether via GSR or other types of reporting) is collected, verified, recorded, analysed and, if necessary, investigated by the *Occurrences and Safety Investigation* function in order to identify potential safety hazards and take any appropriate corrective or preventive measures. The same function is responsible for making notifications in ENAC's ECCAIRS 2 system and subsequently entering the follow-up, resulting from the analysis and summary of the investigation work, in all cases where mandatory notifications to the competent authorities are required in accordance with the timescales and procedures established by the regulations. It also communicates with ANSV (within 60 minutes of the occurrence by the Airport Duty Manager).

In compliance with EU Regulation No. 376/2014 (Article 5.1.b), SEA notifies ANSV of any occurrence which, in the opinion of the Safety Manager, represents or may represent a danger to the safety of operations.

The *Occurrences and Safety Investigation* function of SMS classifies each report received in accordance with the provisions of EU Regulation No. 996/2010 and EU Regulation No. 376/2014; at this stage, the main characteristics of the event are defined:

- *Occurrence category*;
- *Event Type*;
- Initial assessment of the severity *of the occurrence*, evaluated on the basis of **the seriousness** of the consequences caused by the event, namely:

SEVERITY	DEFINITION (ref. Annex 13 ICAO)
INCIDENT	An event that occurs between the time a person boards the aircraft...in which A) A person is killed or seriously injured B) The aircraft suffers damage or structural failure that adversely affects its structural strength, performance or flight characteristics, and which normally requires major repair or replacement of the component. C) the aircraft is missing or completely inaccessible
SERIOUS INCIDENT	An event involving circumstances indicating a high probability of an accident and associated with the use of an aircraft, or involving damage to property or infrastructure or significant injury and/or permanent disability
INCIDENT	An event other than an accident associated with the operation of an aircraft that affects or could affect safety operations, or that involves minor/limited damage to property or infrastructure or minor injuries requiring medical examination.
EVENT	An event that has no safety consequences; minor or negligible damage to property or infrastructure; minor injuries not requiring medical attention (collisions between ramp vehicles, non-SMS events, damage to airport infrastructure, etc.).

For the purposes of this initial classification, the attribution of individual items is also assessed on a case-by- case basis, considering the possibility of associating more than one *category*, as well as the need to identify *the Event Type* that best corresponds to the specific event.

For the purposes of the analysis, the methodologies adopted for the identification and analysis of Hazards and Threats (Chapter 2.2.5.a) and for prospective analyses (Chapter 2.2.5.c) are used at the discretion of the investigator and according to the complexity of the event.

The code for the event to be reported is chosen by the reporter from among the mandatory and suggested options. Airport Safety staff will verify, even retrospectively, the exact classification made by the reporter and, if necessary, correct it, informing the reporter (if known) at the same time.

The initial assessment of the severity *of the occurrence*, in addition to complying with the provisions of EU Regulation No. 996/2010, is supplemented by the Event Risk Classification (ERC) assessment system **for all non-mandatory events.**

The investigation process aims to identify possible threats to aviation safety. Once received by the system, the report is initially assessed using the Event Risk Classification (ERC) methodology and assigned a risk grade. The initial value expressed in the ERC table serves as an objective basis for the investigation process to be carried out, allowing the type of investigation to be modulated.
The system used is able to associate events of the same type and, consequently, add up the ERC values. This involves weighing events both for their severity and frequency of occurrence.

Values **between S1 and S2** and those classified as INCONVENIENT will determine a standard analysis, with data collection, evaluation of all causal elements (human factors, procedural barriers, mitigations/corrections already in place, organisational factors, etc.) and any mitigation actions necessary to reduce the phenomenon, with the involvement of other relevant company departments, as well as any third parties involved.

In the event of **S2** values**>** and events classified as SERIOUS INCIDENT or ACCIDENT, more structured and in-depth investigations may be conducted, at the conclusion of which an Event Analysis Report or Investigation Report will be drawn up; This report details the investigation activity, the analysis of all factual information collected (including the identification of any new threats or latent factors), their analysis, conclusions and Safety Recommendations and/or corrective actions necessary to reduce the risk of recurrence of the event (new procedures, activation of any specific WGs, etc.). If the analysis is related to an event considered a **Mandatory Occurrence Report (MOR)**, the report specifies the root cause analysis, conclusions and corrective actions, which will be sent to ENAC via the ECCAIRS 2 portal.

For all events classified **as Mandatory** under EU Regulation 2015/1018 (Annex 4) and EU 376/2014, the initial risk level of the event will be assessed according to the European Risk Classification Scheme (ERCS) introduced by EU Regulation 2020/2034. The value resulting from this classification is transmitted to the Authority via the ECCAIRS2 portal.

This method of investigation is also used in certain types of occurrences, regardless of the ERC value and classification according to EU Regulation No. 996/2010 and upon assessment by the Safety Services

Airport officers, in collaboration with the Airport Safety Manager, who, due to their specific nature or frequency, require more in-depth investigations based on their potential risk in terms of safety and/or airport operations.
The Event Analysis Report or Investigation Report is signed by the Investigator who carried out the analysis, the Safety Officer and the Safety Manager, then filed in a special folder created on the company server and linked to the database if necessary.

Within the Airport Safety organisation, the Occurrences and Safety Investigation function, based on the GSRs received, assigns tasks to the available resources to initiate investigations and related in-depth analyses.
At the end of the analysis process (closure of the GSR investigation), feedback is sent to the reporter, if requested when the GSR was submitted, and to all interested parties. In this context, *Risk Assessment* analyses are also supported and developed, using established and recognised Safety studies and analyses at European and global level. The data obtained in this way, aggregated and in the form of specific focuses, is then shared with the entire airport system within the various safety committees promoted by SMS (such as the Safety Committee and Working Group).

All documentation relating to the activities carried out by the *Occurrences and Safety Investigations* function is tracked and archived within the IT system in accordance with the procedures laid down for SMS document storage (ref. § 2.2.4).

2.2.8.c Data confidentiality regulations

All safety-related information received via SMS is treated as sensitive and confidential data, adequately protected from use and/or disclosure; it is used solely for the purposes of maintaining and improving safety and not for attributing blame and/or responsibility. The personal details of the personnel involved may only be used for the purposes of analysing the training received or for awareness-raising meetings, and shall not be used for punitive purposes (except in cases of malicious behaviour or where there is clear and serious disregard for an obvious risk, or where a serious lack of professional responsibility in exercising the required diligence has been established).

2.2.8.d Recording

Additional reports received via email at SMS@seamilano.eu, or through the SMS boxes located at the Linate and Malpensa facilities, are entered into the Safety management database, a specific software programme that SEA has specially equipped itself with. Through this system, all documentary evidence and records related to the reporting and investigation of events are received, tracked, managed, archived and stored in electronic format for five years from their creation or last modification.

The application used is equipped with a continuous backup system, which is updated every 24 hours, protected by company information systems, capable of preventing any unauthorised access. The originals of the correspondence documenting the investigations carried out are also archived in paper form – where available – at the Safety Manager's office.

2.2.9 Emergency Response Planning

AMC1 ADR.OR.D.005 (b) (10) – GM1 ADR.OR.D.005 (b) (10)

In order to ensure the continuous improvement of the AEP and the procedures contained therein, SMS verifies the development and implementation of the Plan through the dedicated 'Aerodrome Emergency Committee' working group, formalised within the Safety Committee and chaired by the Safety Manager, in particular with regard to the analysis of the results of exercises and actual emergencies, for the purposes of integrating the Plan itself. (Ref. MDA Section E Chapter 19 - Annex 1).

SMS, through its *Emergency Planning and Response (EPR*) function, collaborates with the Operations Manager (responsible for emergency management and the Aeronautical Emergency Plan/Aircraft Accident Plan), promoting the assessment of existing procedures and the development of new ones, including following hazard identification activities, contributing to the definition of emergency drills for the purpose of continuously improving the Plans, in accordance with the provisions of Chapter 19 of Section E of the MDA.

In order to ensure the coordination of the airport emergency response with the emergency plans of third-party organisations operating airside, in accordance with the PEA, third-party operators are required – prior to the start of operations – to verify and ensure the consistency of their *Local Emergency Response Plan* (LERP) with the PEA.

2.2.10 Management *of Change*

ADR.OR.B.040 – AMC1 ADR.OR.B.040(a)(b) – GM1 ADR.OR.B.040(a)(b) –GM1 ADR.OR.B.040(f) – GM2 ADR.OR.B.040(f) – GM3 ADR.OR.B.040(f) – ADR.OR.B.050 – AMC1 ADR.OR.D.005(b)(6) – GM1 ADR.OR.D.005(b)(6)

2.2.10.a Purpose

SEA identifies the change management process (*Management of Change*) as one of the key elements of its Management System. This is a systematic and documented process aimed at:

- Identify potential risks arising from the introduction of changes;
- Determine interdependencies with affected entities/organisations (internal or external);
- Conducting risk assessments in coordination with these entities/organisations;
- Identifying mitigation actions with stakeholders, implementing them and monitoring them;
- Ensure the transition of change and its interactions with airport operations;
- Ensure that assessments are adequately documented;
- Ensure that the change supports safety improvement as far as reasonably practicable;

The change management process will be activated in the event of changes to the operator's organisation, management system, airport infrastructure or operations that may affect existing processes, procedures and services.

If the changes involve deviations from regulatory requirements, these will be analysed in accordance with the procedures in place; conversely, if the changes are outside the scope of the regulations applicable to the Airport Operator (Reg. 1139/2014, Reg. 139/2014 and subsequent amendments and additions), they may be assessed through a safety study, but will not be managed through the Management of Change procedure.

2.2.10.b Responsibility

The Safety Manager, through the *Change Management, Documentation, Safety Assessment and Analytics* function, is responsible for managing the entire process, including all related communication and verbal exchanges, from the date of *the Initial Change Meeting* (ICM, described below).

2.2.10.c Scope

For the purposes of this procedure, different types of change are defined: infrastructural, organisational, procedural (or a combination of the above).

TYPE OF CHANGE	SCOPE
Infrastructural	Any activity involving a change to infrastructure/facilities that has an impact on airside operations.
Organisational	• Any organisational change involving the operator's certification structure. • Any organisational change involving entities/subsidiaries that perform the airport operator's duties as set out in the airport certification policy ( ). .
Procedural	Any change to the contents of the Airport Manual or its annexes that has an impact on airside operations and is in any way attributable to Reg. 139/2014.

By way of example, the following are some initiatives that constitute a change:

- Changes to the infrastructure/facilities of runways, aprons, taxiways and□ s (Infrastructural)
- Work on horizontal/vertical signage and AVL in the movement area (if it has impact on aircraft operations)□ (infrastructure);
- Changes to airside vehicle traffic and parking procedures□ (infrastructure);
- Changes to aircraft handling and parking procedures□ (procedural);
- Introduction of a new procedure in the MdA□ (procedural);
- Change in certification figures□ (procedural-organisational);
- Change in the organisation of the certification structure□ (procedural-organisational);

If the changes generate deviations from regulatory requirements (AltMoc, SC or EloS), these will be analysed according to the procedures in place.

Changes are divided into changes that require **prior approval** and changes that **do not require prior approval**. Below is a simplified table of the two types of 'change'.

Category	Type	Definition	Implementation timeline
1	**Change WITH APPROVAL**	Change requiring formal approval by the Authority prior to implementation .	After approval by the Authority,
2	**Change WITHOUT APPROVAL**	Change that does not require formal approval by the Authority prior to implementation, but only prior notification.	Immediate implementation of the change upon formal submission of the documentation to the Authority.
3	**No Change**	N/A (*in the case of routine/extraordinary maintenance that does not involve changes, a risk assessment of the construction site is still required, as regulated in Chapter 13 of the MdA*).	NA

In order to provide more detailed information on the different types of change, Annex 5 of the SMS Manual lists the cases corresponding to the different types of change.

2.2.10.d Process description

Prior to any change being implemented, the process owner must submit the necessary documentary evidence to the relevant functions (Nominated Person to the Change Manager, hereinafter CM) for a correct assessment of the effects of the change. This assessment is necessary to ensure that the change introduced does not alter the safety of operations, including through the possible implementation of effective mitigating actions to be implemented for this purpose.

No.	PHASE	RESPONSIBLE	ACTIVITY
1	Preparation of documentation	Process Owner	Prior to any change being implemented, DRAWS UP a document containing the aspects relating to the change and COMMUNICATES the need for the change and the implementation timescale.
2	Initial Change Meeting (ICM)	Process Owner	ACTIVE, Initial Change Meeting composed of PH/Manager, SM, CMM, TM, CM (**Evaluation Team**). The Team is coordinated by the SM
3	Illustration of change	Process Owner	ILLUSTRATES, during the ICM, the methods of change and the previously prepared documents.

4	Preparation of documentation	Safety Manager	SUBMIT to the Assessment Team the list of documents necessary for a correct assessment of the effects induced by the change itself.
5	Identification of the category of change	Assessment Team	Based on current legislation, Annex 5 to this Manual, concerning Change Management, IDENTIFIES the category of change: • 1 – Change with Approval; • 2 – Change without Approval; • 3 – No Change.
5 B	Categories 1 and 2		ACTIVATION of impact assessment procedure (safety assessment, compliance and supporting documentation) as described below.

2.2.10.g Infrastructural Change

In the event of infrastructure changes, during the ICM, it is necessary to submit and make available to the Assessment Team the executive project documents with the aim of sharing drawings and layouts, information on the intervention's "Action Plan" and the related timetable.

The Safety Manager prepares a checklist (with the points described below) for a YES/NO assessment of the impact that each specific point may or may not have on the rest of the process. Points that receive a positive assessment must then be examined in greater detail.

The main items subject to verification are as follows:

- Certification Basis;
- Certification Specification;
- Airport manual;
- Impact on third-party organisations operating at the airport
- Limitation of apron areas following construction work;
- Electromagnetic interference from new infrastructure;
- Modification of aeronautical publications;
- Environmental impacts;
- Obstacles caused by infrastructure and/or construction equipment;
- Horizontal and vertical signage;
- Access plan to the areas affected by the works;
- Possible implications with the risk of impact with wildlife;
- Changes to existing airport operating procedures;
- Training;
- Emergency procedures;
- Safety procedures;
- AWO procedures;
- Runway incursion risk;
- Impact on third-party organisations operating at the airport;
- Amendment to aeronautical publications

- Impact in terms of human factors and interface/interactions between the proposed change and the rest of the system.

While recognising that these elements may not be available or fully developed during the preliminary planning phase, they must necessarily be prepared before the risk assessment is drafted.

The level of detail is that required by EU Regulation No. 139/2014, commensurate with the size and complexity of the planned infrastructure modifications.

Within the ICM, the assessment team gives its opinion, where possible, at the same time as the documentation is submitted. In more complex cases, i.e. where the analysis of the documents requires more time, the utmost attention will be paid to ensuring that the interventions are carried out on time.

The following are the steps to be taken following an **infrastructure** change:

No.	STAGE	RESPONSIBLE	ACTIVITY
A	**Design: technical and economic feasibility/final level**		
6 Infr	Preliminary analysis	PH Design	PREPARES the technical and economic feasibility project and shares it with the Safety Manager and the CM for the appropriate safety assessments. COMPLETES sections 1 and 2 of the CMF.
7 Infr	Compliance Checklist	PH Design	PREPARES the compliance checklist and sends it to the CMM for verification of compliance. COMPLETE section 3 of the CMF. IF NECESSARY, initiate the documentation for the proposal to ENAC to modify the Certification Base signed by AM and CMM and the certificate specification and any supporting documents for deviations.
8 Infr	CMF compilation	Training Manager	FILL IN section 6 of the CMF.
9 Infr	Safety impacts	SM	DRAW UP the ICM report described in phase 2 (§ 2.2.10f), providing an initial assessment of safety aspects, and ATTACH the checklist containing the main items subject to verification to this document. FILL IN the remaining sections of the CMF.
10 Infr	Quality Review	CMM	PERFORMS the quality review of the entire documentation. If the outcome is positive, INFORM the Design PH.
11 Infr	Submission of project to ENAC	PH Design	SEND, using the company's Infrastructure Development Authorisation Process function, the technical and economic feasibility study, the CMF, and the Compliance Checklist to the relevant local Operations Department, which is responsible for overseeing airport certification, and a copy to the Planning and Projects Department in the case of projects falling within the latter's remit, in accordance with the powers defined in ENAC Circulars APT 21 and APT 13. by registered letter and COMMUNICATE this protocol to the CMM. In the case of CHANGES REQUIRING PRIOR APPROVAL, a) if the preliminary investigation of the Project falls within the competence of the Operations Department (according to the powers defined in ENAC Circulars ENAC APT 21), receives a single

			measure relating both the approval of the change and the approval of the project; b) if the preliminary investigation of the Project falls within the competence of the Planning and Projects Department (according to the provisions of ENAC APT Circular 21), once a positive opinion on the change has been received from by the Operations Department , FORWARDS the executive project to the former for subsequent approval.
B	**Design: Executive design (final in the case of integrated contracts)**		
12 Infr	Project implementation	PH Design	Once approval has been received from the authority, DRAW UP the executive design and share it with the Safety Manager and the CM for the appropriate safety assessments. COMPLETES sections 1 and 2 of the CMF, where updated due to changes.
13 Infr	Compliance checklist	PH Design	PREPARE, where updated for changes that have occurred, the compliance checklist and send it to the CMM to verify its compliance. COMPLETE section 3 of the CMF. INITIATE, if necessary, the documentation for the proposal to ENAC to amend the Certification signed by AM and CMM.
14 Infr	Risk Assessment	SM	PREPARES, in collaboration with the process owner, the risk assessment with, if necessary, the activation of action groups. Involves, where necessary, third-party organisations operating at airport involved by the change by convening WGs. IDENTIFIES with them the interdependencies with other interested parties, PREPARES the Safety Assessment in coordination with these organisations, systematically aligning assessments and mitigations. FILL IN sections 4, 5 and 7 of the CMF. ENTER an alphanumeric code consisting of the wording "MXP(LIN)_W_APP" (if the change requires approval) or "MXP(LIN)_NO_APP" (if NOT approved), followed by a sequential number, the symbol "/" and the last twodigits of the year in course (e.g. MXP_W_APP01/19 or LIN_NO_APP01/19).
15 Infr	Syllabus Update	Training Manager	UPDATE, if necessary, the syllabi subject to change and prepare training for any refresher courses. FILL IN section 6 of the CMF.

16 Infr	Preparation of documentation	CMM	RECEIVE all documentation from all Nominated Persons. SIGNS the CMF, guaranteeing the compliance of the change with applicable regulations and the compliance of the change implementation process with the provisions of the specific MoU procedure (quality review). SEND the CMF Design PH, the RA and the compliance checklist.
17 Infr	Submission of project to ENAC	PH Design	SEND, in the event of CHANGES THAT DO NOT REQUIRE APPROVAL, with a registered letter COMMUNICATING this protocol to the CMM, to the ENAC Operations Directorate with territorial jurisdiction, through the company's Infrastructure Development Authorisation Process function, the following documentation: • the executive project, • the CMF, • the Compliance checklist. SEND, in the case of CHANGES THAT REQUIRE PRIOR APPROVAL, with a registered letter COMMUNICATING this protocol to the CMM, to the ENAC Operations Directorate with territorial jurisdiction, owner of the airport certification surveillance process, and, in copy, to the Planning and Projects Directorate, in the case of projects falling within the latter's remit according to the powers defined by ENAC Circulars APT 21 and APT 13°, through the company's Infrastructure Development Authorisation Process function, the following documentation: • the executive project, • the CMF, • the Compliance Checklist; • the Safety Assessment, • the proposed amendment to the Certification Base (if necessary), • the proposed amendment to the Certification Specification (if necessary) • documentation relating to any deviations;

			• any other supporting documentation. In the case of CHANGES REQUIRING PRIOR APPROVAL, a) if the preliminary investigation of the Project falls within the competence of the Operations Department (according to the provisions of ENAC APT Circular 21), it shall receive a single measure from the latter relating to the approval of the change and the approval of the project; b) if the preliminary investigation of the Project falls within the competence of the Planning and Projects Department (according to the provisions of ENAC APT Circular 21), once a positive opinion on the change has been received from the Operations Department, it FORWARDS the executive project to the former for subsequent approval.
18 Infr	Documentation archiving	CMM	FILES all documentation in its own secretariat documentation.
CHANGES REQUIRING PRIOR APPROVAL			
19 Infr Prior Appr	Activation of refresher courses	Nominated Person	Once approval has been received from ENAC, INVIA shall, within the scope of its competence and if necessary, send the appropriate resources to refresher courses.
20 Infr Prior Appr	Updating of aeronautical charts	Maintenance Manager	ACTIVATES, if necessary, the appropriate procedure for updating aeronautical documentation with effect from the date of approval by ENAC.
21 Prior Approval	Update of Airport Manual procedures	SM	Upon completion of the infrastructure modification and before it enters into operation, it shall PUBLISH the changes to the Airport Manual where required, notifying all NPs with effect from the date of approval by ENAC. N.B.: any changes will only become effective after the completion of staff training and publication of the relevant aeronautical information , where applicable.

CHANGES NOT REQUIRING PRIOR APPROVAL			
19 Infr No Appr	Activation of refresher courses	Nominated Person	SEND, on the day following the notification to the authority, as far as it is competent and if necessary, the appropriate resources to refresher courses.
20Infr No Appr	Updating aeronautical charts	Maintenance Manager	ACTIVATE, if necessary, the appropriate procedure for updating aeronautical documentation. This documentation shall take effect from the day following the notification to the authority and in any case before the infrastructure modification is actually put into operation.
21Infr No Appr	Update of Airport Manual procedures	Nominated Person	Upon commissioning of the infrastructure modification, PUBLISH the changes to the Airport Manual where required, notifying all NPs with effect from the day following the sending of the notification to the authority ~~or~~. N.B.: any changes shall only become effective after the completion of staff training and the publication of the relevant aeronautical information, where applicable.

2.2.10.h Operational/Procedural Change

In the event of procedural changes, during the ICM, the *Process Owner* must submit and make available to the Assessment Team the draft of the procedure subject to change. Within the ICM, the Assessment Team expresses its opinion at the same time as the documentation is submitted. In more complex cases, i.e. where the analysis of the documents may take longer, the utmost attention will be given to the urgent matters that led to the request for change.

For this type of change, the Safety Manager also prepares a checklist for an assessment (YES/NO) in relation to the impact that the specific point may or may not have on the rest of the process.

The main items subject to verification are as follows:

- Airport Manual Modification
- Involvement of business functions
- Third-party involvement
- Modification of Airport Regulations
- Amendment of company manuals
- Assessment of the adequacy of infrastructure in relation to the proposed modifications

- Risk of RWY incursion
- Amendment to aeronautical publications
- Training
- Impact on third-party organisations operating at the airport
- Impact in terms of human factors and interface/interactions between the proposed change and the rest of the 'system'.

The following are the steps to be taken following procedural changes:

No	STAGE	RESPONSIBLE	ACTIVITY
6 Proc	Preparation of new Procedure	Process Owner	DRAWS UP the new procedure and SHARES it with the Safety Manager and CM for appropriate safety assessments and consistency with current company safety procedures. COMPLETES sections 1 and 2 of the CMF.
7 Proc	Compliance Checklist	Process Owner	PREPARES the compliance checklist and sends it to the CMM for verification of compliance. FILL IN section 3 of the CMF.
8 Proc	Risk Assessment	SM	PREPARES, in collaboration with the process owner, the risk assessment with, if necessary, the activation of action groups. Where necessary, involves third-party organisations operating at the airport affected by the change by convening WGs. IDENTIFIES with them the interdependencies with other stakeholders, PREPARES the Safety Assessment in coordination with these organisations, systematically aligning assessments and mitigations. COMPLETES sections 4, 5 and 7 of the CMF. INSERT an alphanumeric code consisting of the wording 'MXP(LIN)_W_APP' into the CMF (if the change requires approval) or 'MXP(LIN)_NO_APP' (if NOT approved), followed by a sequential number, the symbol '/' and the last two digits of the current year in (e.g. MXP_W_APP01/19 or LIN_NO_APP01/19).
9 Proc	Syllabus updates	Training Manager	UPDATES, if necessary, the syllabi subject to change and prepares training for any refresher courses. FILL IN section 6 of the CMF.
10 Proc	Preparation of documentation	CMM	RECEIVE all documentation from all Nominated Persons.

			SIGN the CMF, ensuring that the change complies with applicable regulations and that the change implementation process complies with the provisions of the specific MoU procedure (quality review). SEND the CMF, the RA (only if change with approval), and the procedure itself to ENAC DO for approval or notification. ARCHIVE at the your secretariat.
CHANGES REQUIRING PRIOR APPROVAL			
11 Proc Prior Appr	Activation of refresher courses	Nominated Person	Once approval has been received from ENAC, SEND, for as appropriate and, if necessary, the appropriate resources to refresher courses.
12 Prior Approval Procedure	Updating of aeronautical charts	Maintenance Manager	ACTIVATE, if necessary, the appropriate procedure for updating aeronautical documentation with effective from day of approval by ENAC.
13 Proc Prior Appr	Update of procedures in the Airport Manual Procedures	Procedures	PUBLISHES the procedures of the MdA where required, notifying all NPs with effective from day of approval by ENAC.
CHANGES NOT REQUIRING PRIOR APPROVAL			
11 Proc NO APPROVAL	Activation of refresher courses	Nominated Person	SEND, the day after sending the notification to the authority, for as of competence and, if necessary, the appropriate resources to refresher courses.
12 Proc NO APPROVAL	Updating aeronautical charts	Maintenance Manager	ACTIVATES, if necessary, the appropriate procedure for updating aeronautical documentation with effect from the day following the notification being sent to the authority.
13 Proc NO APPROVAL	Update of Airport Manual procedures	Nominated Person	PUBLISH the Airport Manual procedures where required, notifying , , , , NP effective from the day following the sending of the notification to the authority.

In the event of minor changes that do not require approval by ENAC (ref. Annex 5 MDA SMS), purely attributable to editorial corrections/changes, the simplified ICM (Annex 2 MDA SMS) shall be used to support document traceability and the effective disclosure of the change to all NPs concerned and involved in the change.

2.2.10.i Organisational Change

In the event of organisational changes, during the ICM, the Process Owner must submit and make available to the Assessment Team the draft documentation subject to change.
Organisational changes include all changes that have a significant impact on the constituent elements of the Management System:

- Responsibilities and accountability of the AM, Nominated Person, CMM, SM,
- Safety Policy and Objectives,
- Hazard Identification Process,
- Risk Assessment/Management Process,
- Safety Performance Monitoring Process,
- Change Management Process,
- Safety Training Programme,
- Safety Communication,
- Compliance Monitoring.

The Safety Manager prepares a checklist for a YES/NO assessment of the impact that the specific point may or may not have on the continuation of the process. The main items to be verified are as follows:

- Change in responsibility of Nominated Person
- Change in organisational structure
- Training
- Change in Airport Regulations
- Airport Manual Amendment
- Impact on procedures resulting from organisational changes
- Impact in terms of human factors and interface/interactions between the proposed change and the rest of the 'system'.

The following are the steps to be taken following organisational change:

No.	STEP	RESPONSIBLE	ACTIVITY
6 ORG	Preparation of new organisational structure	Process Owner	SHARES the change in question with the Safety Manager and CM for appropriate safety assessments. COMPLETES sections 1 and 2 of the CMF.
7 ORG	Compliance Checklist	Process Owner	PREPARES the compliance checklist and sends it to the CMM for verification of compliance. COMPLETE section 3 of the CMF.
8 ORG	Risk Assessment	SM	PREPARES, in collaboration with the process owner, the risk assessment with, if necessary, the activation of action groups. INVOLVES, where necessary, third-party organisations operating at the airport affected by the change by convening WGs.

			IDENTIFIES with them the interdependencies with other interested parties, PREPARES the Safety Assessment in coordination with these organisations, systematically aligning assessments and mitigations. COMPLETES sections 4, 5 and 7 of the CMF. INSERT an alphanumeric code consisting of the wording 'MXP(LIN)_W_APP' (if the change requires approval) or 'MXP(LIN)_NO_APP" (in the case of a minor change), followed by a sequential number, the symbol "/" and the last two digits of the current year (e.g. MXP_W_APP01/19 or LIN_NO_APP01/19).
9 ORG	Syllabus Updates	Training Manager	UPDATES, if necessary, the syllabi subject to change and prepares training for any refresher courses. FILL IN section 6 of the CMF.
10 ORG	Preparation of documentation	CMM	RECEIVES all documentation from all Nominated Persons. SIGN the CMF, ensuring that the change complies with applicable regulations and that the process for implementing the change complies with the provisions of the relevant MoU procedure (quality review). SEND the CMF, RA and Compliance Check List (only if prior approval is required) and the new organisational structure to ENAC DO for approval or notification. FILE the entire documentation with your secretariat. all documentation.
CHANGES REQUIRING PRIOR APPROVAL			
11 ORG Prior Appr	Activation refresher courses	Nominated Person	Once approval has been received from ENAC, INVIA, for as appropriate and if necessary, the appropriate resources to refresher courses.
12 ORG Prior Appr	Aeronautical chart refresher	Maintenance Manager	ACTIVATE, if necessary, the appropriate procedure for updating aeronautical documentation with effect from the date of approval by ENAC.
13 ORG Prior Appr	Updates to Airport Manual Procedures	Nominated Person	PUBLISH the Airport Manual procedures where required, notifying all NPs with effect from the date of approval by ENAC

CHANGES NOT REQUIRING PRIOR APPROVAL			
11 ORG No Approval	Activation of refresher courses	Nominated Person	SEND, on the day following the notification to the authority, as appropriate and if necessary, the appropriate resources to refresher courses.
12 ORG No Approval	Updating of aeronautical charts	Maintenance Manager	ACTIVATE, if necessary, the appropriate procedure for updating aeronautical documentation with effect from the day following the notification to the authority.
13 ORG No Approval	Update of Airport Manual procedures	Nominated Person	PUBLISH the Airport Manual procedures where required, notifying all NPs with effect from the day following the sending of the notification to the authority.

N.B.: If the change relates to a change in the person responsible, the relevant procedures set out in ENAC LG 2019/003- APT and 2017/003-APT shall apply.

2.2.10.l Information, education and training

For each Change procedure, the Training Manager examines the potential operational impact on the various professional figures involved and the possibility of updating the related training courses associated with them. This analysis is carried out by consulting the various Syllabi defined in the database managed by the Training Manager. This activity must be carried out before proceeding with the change.

The Training Manager is responsible for describing the required changes to the Syllabi in point 6 of the CMF, including the operational subjects affected by the new training requirements that have emerged.

2.2.10.m SEA/ENAV agreement on change management

If ENAV and SEA request a change that could potentially impact the safety levels of the other party's operations, the procedure governed by the SEA-ENAV Framework Agreement – Technical Annex No. 9: *Change Management* shall apply. The procedure governs two main roles:

- OWNER: the company (ENAV or SEA) originating the change
- FEEDER: the company (ENAV or SEA) which, in the opinion of the OWNER, could be impacted by from the change.

The OWNER shall send the FEEDER a description of the change by completing a specific form (MOD.A), attached to the procedure, indicating the relevant implementation times and highlighting the potential impact on the FEEDER's activities. In this communication, the OWNER shall express whether or not it is necessary to set up a 'mixed' working group on the change to be implemented.

The OWNER must send Form A by email to the company email address
with the completed form attached, provided that it is registered and signed by the OWNER.
After carrying out the appropriate assessments based on the information received, the FEEDER must notify the relevant OWNER, alternatively:

a) the need to create a 'mixed' working group to assess the safety of the change, or
b) the need to remain informed about the change, in relation to the parts under its responsibility, in cases where there is no need to create a specific Working Group for the Safety assessment of the change.

For all specifications regarding the timing and methods of coordination of safety assessments, please refer directly to the procedure set out in Annex 9 to the SEA-ENAV Framework Agreement.

2.2.10.n SEA/VVF Agreement on change management

In the event of any change, even temporary, in the provision of rescue and firefighting services, reference should be made to the VVF-SEA Framework Agreement and related annexes, published in the MDA documentation, in the section: *Agreements with Entities.*
Other types of changes that may have an impact on the VVF will be managed as for any third-party organisation operating at the airport.

2.2.10.o Management of deviations and alternative compliance methods

Deviations are managed in accordance with the rules contained in the following Guidelines:

- LG–2016/002-APT – GUIDELINES FOR THE MANAGEMENT OF DEVIATIONS FROM THE CERTIFICATION SPECIFICATIONS ISSUED BY EASA FOR THE AIRPORT DOMAIN;
- LG – 2016/001-APT – ALTERNATIVE MEANS OF COMPLIANCE (AMC) ISSUED BY EASA FOR THE AIRPORT DOMAIN.

2.2.11 Safety Promotion

AMC1 ADR.OR.D.005 (b) (9) – GM1 ADR.OR.D.005 (b) (9)

Safety Promotion is a fundamental component of **the Safety Management System (SMS)** and, together with **the Safety Policy** and the organisational objectives defined therein, constitutes a key element for the **continuous improvement** of safety levels.
Through the promotion of safety, an organisation does not merely pursue the objective of preventing accidents or reducing their frequency, but actively promotes a safety culture based on proactive and responsible behaviour. This approach encourages the adoption of good operating practices by operators and organisations, ensuring that the correct actions are taken both in normal operating conditions and in emergency situations.

In the SMS architecture, the ICAO outlines Safety Promotion as consisting of two main elements
:

- Communication;
- Training.

The following paragraphs describe the tools used by SEA's SMS to promote
safety issues through communication and training tools.

2.2.11.a The communication process

Communication is a significant issue in terms of human interaction; it plays a fundamental role in air transport and, in particular, in the field of aviation safety. Communication in the field of safety aims to ensure that staff are aware of the safety management system, to convey critical safety information, and to explain why particular mitigation/improvement measures are adopted or why procedures are introduced or modified. The ultimate goal of communication is also to promote and support a safety culture at airports, i.e. increasing awareness of safety issues among operators.

SEA SMS is constantly committed to disseminating the objectives and procedures of the safety management system to all operational personnel, so that the SMS system and its application are evident and integrated into all aspects of operations. The circulation of information *from the top down* and *bottom up* helps to ensure awareness and commitment at every level.

To this end, the following paragraphs describe the communication tools used by the SMS.

The Safety Management System has a section on the website www.seamilano.eu and on the company intranet https://seamilano.eu/it/gruppo/safety-delle-operazioni-aeroportuali/safety-management-system https://sts.seamilano.eu/appositamente dedicated to disseminating safety-related documentation to members of the Safety Committee.

Safety campaigns

In order to promote safety and increase the awareness of airport operators about operational risks and how to prevent them, the SMS promotes awareness campaigns on safety issues.

These use different methods of communication in order to increase the culture of safety among the airport population (or among the personnel identified as the target audience for the campaigns).

Each campaign is developed by defining a main theme and a target audience for the campaign. Based on these elements, a communication strategy is developed, which may include the organisation of conferences, training meetings, courses or simply the dissemination of material developed on the topic.

The Safety Management System carries out safety campaigns on an annual basis.
The promotion of a culture of safety may also include the organisation of a Safety Week, during which the Safety Management System distributes promotional gifts to those who have
carried out activities in accordance with the required safety standards.

The Safety Management System's safety campaigns are stored in the network folder.

Within the Safety Committee and Working Group, the SM mainly acts in communication with the internal SMS departments of third-party operators, urging them to disseminate the issues dealt with within their organisations and to their operational staff.
The content presented and discussed within the various Safety Committees is summarised and made available to all operational staff in the form of *Safety Recommendations*, Safety *Bulletins* and Operating Instructions through various easily accessible and consultable tools and channels such as:

- SEA intranet/extranet
- E-mail
- Posting in departmental Safety Corners (present in each airport)
- Safety Talks with operational staff (organised on an ad hoc basis).

2.2.11.b Staff Training

SEA believes that staff training plays a key role in achieving/maintaining professionalism, which is a determining factor for the highest levels of safety. To this end, it designs and implements procedures that include the acquisition of skills and awareness of roles and systematic staff training initiatives, which include specific initial training courses as well as recurring training initiatives.

It activates and develops training methods both through continuous checks and during the performance of operational activities, aimed at ensuring that staff, whatever their function and level, are aware of the importance of complying with safety policies and requirements and of the possible consequences of any deviation from them.

In this context, the SM maintains constant collaboration with the Training Manager for the establishment, updating and implementation of courses related to safety issues. The *Training Shared Services* function is responsible for integrating safety content on an ongoing basis.

within the mandatory courses required by law (ref. EU Reg. No. 139/2014) and those relating to operational procedures, ensuring the promotion of SMS and the involvement of operational staff in reporting hazards.

As described in detail in Chapter 3 of the MDA, SEA, as the operator, is responsible for ensuring that all personnel, in the course of their airport duties, are adequately aware, educated and trained to comply with the principles of the policy and the requirements of SMS. Training activities are aimed at all SEA Group company tasks in accordance with IATA and ICAO standards and mandatory national and international regulations.

SMS also intends to share training requirements with other airport operators, with a view to prevention and contributing to compliance with common safety conditions. Specifically, SEA *Training Shared Services* develops and defines training manuals in accordance with current standards and regulations (IATA, ICAO, AEA, ENAC). In collaboration with SMS, the training programme for SEA Group personnel on safety issues is agreed upon, with particular attention to risk management.

Training and instruction on safety issues specific to driving vehicles (in relation to the ADC – *Airport Driving Certificate*) in the movement area are carried out by *Training Shared Services* in collaboration with the SMS function, which oversees, with its own manager, the examination sessions required for the issue of red airport licences (with access to the manoeuvring area).
The SEA *Training Shared Services* function carries out training activities in accordance with the planning referred to in the above criteria, while also retaining responsibility for:

- providing recurrent training courses that vary according to the type of activity performed, in accordance with the timelines defined by the main competent authorities (ENAC, EASA, IATA, ICAO);
- provide *remedial* courses where specific awareness-raising activities are required for an employee or group of employees, following mitigation actions identified by SMS, resulting from investigations and/or specific risk analyses conducted;
- distribute, in support of the intervention, specific documentation prepared by SMS, such as Ground Safety Recommendations or specific case studies;
- issue certificates/attestations of participation for recurrent training and education interventions.

SMS verifies the effectiveness of the training activities carried out by comparing the trend of events monitored on a monthly basis (e.g., GSR analysis, information gathering, *near misses*, VOR, ECCAIRS 2.0, etc.). In cases where a deterioration in operational performance or a recurrence of similarly classified events is found, SMS prepares and agrees on a review of the training content of the courses provided in order to normalise airport safety levels.
Training Shared Services archives, on company technology, the documentation relating to the courses carried out, which must normally include the following:

- course topics;
- names and signatures of participants;
- duration of the course;
- teachers;
- date and place of delivery;
- methods of assessment and qualification of participants (if applicable);
- copy of the teaching materials used.

2.2.12 SMS output: reports and risk analysis

AMC1 ADR.OR.D.005 (b) (7) – GM1 ADR.OR.D.005 (b) (7)

The list includes the main documents produced by the Safety Management System, such as evidence and results of the various activities carried out:

- Safety assessment
- Monitoring reports/checklists and analyses
- KPIs and Safety Indicators: parameters and related statistics
- Internal investigation reports
- Safety Recommendations / Safety Notices
- Hazard register
- Event Analysis Report or Investigation Report
- Ground Safety Recommendations
- Safety Information Bulletin
- Documentation relating to committees: Safety Review Board, Safety Committee, Working Group, Safety Action Group and any other meetings and safety working groups.
- Operational applications/interpretations of international and national publications in the sector (EASA, ICAO, ANSV, ENAC)
- Apron speed measurements.

Further details regarding the keeping of documentation are described in paragraph 2.2.4 of this SMS Manual, to which reference should be made.

2.2.13 Annexes to this SMS Manual

- Annex 1: Safety Policy: Declaration signed by the Accountable Manager
- Annexes 2a and 2b: Simplified ICM Form (Linate and Malpensa)
- Annex 3.a; 3.b Event Analysis Report – Investigation Report
- Annexes 4a and 4b: *Change Monitoring Form* (Linate and Malpensa)
- Annex 5: Definitions of types of change
- Annex 6: Description of Airport Safety Promotion Programmes
- Annex 7: ICM Minutes