Safety Audits and Compliance Monitoring
Airside Operational Instruction 10

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AOI 10 Owner - Compliance & Business Resilience
1. INTRODUCTION

1.1 In order to ensure safe activities MAG applies a “3 lines of defence” approach to auditing and assurance. These are as follows:

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Functions that own and manage risks
Formed by managers and staff who are responsible for identifying and managing risk as part of their accountability for achieving objectives. Collectively, they should have the necessary knowledge, skills, information, and authority to operate the relevant policies and procedures of risk control. This requires an understanding of MAG, its objectives, the environment in which it operates, and the risks it faces.

Functions that oversee or who specialise in compliance or the management of risk
Provides the policies, frameworks, tools, techniques and support to enable risk and compliance to be managed in the first line, conducts monitoring to judge how effectively they are doing it, and helps ensure consistency of definitions and measurement of risk. Examples: Health & Safety, Legal, Airfield Safety Assurance, Risk, Information Security etc.

Functions that provide independent assurance
Provided by internal and external audit. Tasked by, and reporting to the audit committee, Internal Audit provides an evaluation, through a risk-based approach, on the effectiveness of governance, risk management and internal control.

1.2 At EMA the 1st line of defence are the operational departments who carry out safety auditing to ensure that all procedures are being followed. These departments primarily include Airfield Operations, RFFS, Air Traffic Services and Operations - Developments and Safety. The 1st line of defence also produce individual department risk registers and Safety Assurance Documents (SADs) and ensure that these are effective and up to date.

1.3 The 2nd line of defence is the Compliance and Business Resilience (CBR) department who implement the airport’s Compliance Monitoring System (CMS). The Head of Compliance and Business Resilience (HCBR) is the owner of the Operations Safety Risk Register and the Security Risk Report and ensures that the mitigations listed are effective. The HCBR is also the Risk Coordinator for the Operations department.

1.4 The 3rd line of defence are MAG internal auditors and external bodies (regulators, contracted auditors etc) who audit the effectiveness of the risk control measures and procedures implemented by EMA. For MAG, the Risk and Audit Department undertake an assurance programme against the EMA level 1 risk register and provide detailed reports and recommendations on the effectiveness of the governance and controls for these risks.

SECTION 2 – SAFETY AUDITING

2.1 Safety auditing at EMA is carried out by the operational departments (1st line of defence) to ensure that the procedures contained in the Aerodrome Manual and AOIs are being applied and that risk mitigation measures are effective.

2.2 Department managers are responsible for their own safety audit programmes, which may include the following:

- Apron and turnaround monitoring (detailed separately in AOI 11)
- Departmental assurance programmes, such as 3 tier audits. These are undertaken by management within the department to ensure that their own procedures are robust and effective.
- Third party auditing. These ensure that procedures carried out by third party but listed as mitigation in risk assessments and SADs are robust and effective.
- Specialist audits, such as fuel auditing (see section 3 below).
2.3 The outputs of safety audits will be reported to the individual safety committees (Airfield Safety Committee, Pilots Liaison Group etc) as relevant to ensure that actions and trends identified are resolved.

2.4 Safety audits will be checked as part of the CMS to ensure that they are being undertaken at the frequency detailed in department procedures and that any identified actions are being followed up.

SECTION 3 – COMPLIANCE MONITORING

3.1 EU 319 2014 requires that airports implement “a formal process to monitor compliance of the organisation with the relevant requirements.” EMA implements this through a formal Compliance Monitoring System (CMS).

3.2 At EMA the CBR department implement the CMS and act as the 2nd line of defence for the airport. Full details of the CMS are contained in the separate Compliance Monitoring Manual.

3.3 The CBR team will also ensure that all actions identified in audits by the MAG Risk and Internal Team are implemented and followed up within required timeframes.

3.4 The CMS also incorporates the auditing of contracted activities as required by EU 139 2014.

SECTION 4 – FUELLING FACILITIES AUDITS

4.1 Introduction

It is the responsibility of the fuel supplier to ensure that on delivery fuel is fit for aviation purposes. After fuel has been delivered, the responsibility for safekeeping, quality control and proper delivery to aircraft lies with the manager of the fuel installation. This Procedure describes the measures taken by East Midlands Airport (EMA) to ensure the appropriate standards for fuel are maintained.

4.2 Fuel Farms at EMA

4.2.1 There are three fuel farms on site at EMA, operated and managed by North Air Refuelling Services Limited; Valero Limited (through the Texaco brand) and Donington Aviation.

4.2.2 North Air and Valero are the suppliers and distributors of fuel to the scheduled, inclusive tour, cargo and the majority of visiting general aviation aircraft at EMA.

4.2.3 Further distributors of aircraft fuel include:
   ▪ Sloane Helicopters (Fuel only supplied for use in their aircraft)
   ▪ RVL Group (Fuel is supplied by North Air Refuelling Services Limited and distributed for use via company bowsers)
   ▪ Signature
   ▪ Airborne Colours (defueling only)

4.3 Procedures

4.3.1 EMA will, on an annual basis, commission a suitably qualified person to carry out an audit of all fuel facilities against procedures detailed in AOI 20 “Safe Storage and Handling of Fuel and Dangerous Goods” and CAP 748. Results of the audits will be made available to the facility providers.
4.3.2 Audits will be arranged by the Operations – Developments and Safety Manager who will also receive the audit report and ensure that any action points raised by the audit are implemented. Outcomes from these audits will also be reported to the Safety Review Board.

4.3.3 As part of the CMS the CBR department will ensure that these audits are undertaken in line with these requirements.