

SAFETY MANAGEMENT SYSTEM MANUAL



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Objective

The Safety Management System Manual describes the core elements of the Safety Management System (SMS) and provides consistent methods for managing Health, Safety, Quality and Security in accordance with the G2 Secure Staff’s Safety Policy, IATA ISAGO standard and all applicable regulations and requirements. The purpose of the SMS is to provide a framework for maintaining a safe operation through the identification of hazards, mitigation of risks, and the promotion of safety awareness throughout the organization.

1. Scope

This SMS is applicable to all operations and personnel located at the airport facilities and offices identified on the G2 Station List or as designated by the specific procedure.

2. Relationship to International Standards

The Safety Management Systems Table listed below, maps the relationship of the Federal Aviation Administration’s (FAA) requirements noted in 14 CFR Part 5 for an Safety Management System. The SMS procedures associated with each FAA SMS elements can all be found at the following link: www.g2safety.org

Management System Table

FAA SMS Order	OHSAS 18001 Requirement	ISAGO ORM GOSM Ed. 6	Relevant Safety MS Procedure	Document #
Subpart B: Safety Policy	4.2. OH&S Policy	ORM 1.2.1, ORM 1.2.2 Policy that commits the organization to a culture of safety and security and continuous improvement of the SMS	G2 Safety Policy	N/A
5.23 Safety Accountability and Authority 5.25 Designation and Responsibilities of required Safety Management Personnel	4.4.1 Resources, roles, responsibility and authority	ORM 1.1.6 Define safety responsibilities of management and non-management personnel throughout the organization and specify the levels of management with the authority to make decisions that affect the safety of ground operations	Resources, roles, responsibility and authority is addressed in section 5.1 of this SMS Manual. Additionally responsibilities required for the effective implementation, maintenance and continuous improvement of the Safety Management System procedures	SMS Manual

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			are documented in each of the Management System procedures under section 3.	
5.27 Coordination of Emergency Response Planning	4.4.7 Emergency preparedness and response	ORM 3.1.6 (Not required to date)	Emergency Planning	SM – 13.8, 15.1, 15.2.1 SMS – 11.0
			G2 Emergency Response and Coordination Team	
Subpart C: Safety Risk Management	4.3. Planning			
5.53 System Analysis and Hazard Identification 5.55 Safety Risk Assessment and Control	4.3.1 Hazard identification, risk, assessment and determining controls	ORM 3.2.1 (Not required to date)	Station Safety Risk Assessment	
		ORM 3.2.3 (Not required to date)	Corporate Safety and Health Risk Assessment	SM – 2.0, 2.3-2.7, 8.0-10.0, 12.0 SMS – 6.0
	4.3.2 Legal and other Requirements		Legal, Regulatory and Other Requirements	SM - .09, 2.3, 4.6, 5.2, 8.2.3, 11.2.1, 11.6, 12.0, 13.7, 22.2.1, 26.15, 31.15, 37.15, 39.1, 39.4 37.15
	4.3.3 Objectives and Program(s)	ORM 3.3.2 (Not required to date)	Safety Goals	SM – 2.7 SMS – 12.1
Subpart D: Safety Assurance	4.4. Implementation and Operation 4.5 Checking	ORM 3.3.2 (Not required to date)		
5.71 ((a) 1-2) Safety Performance Monitoring and Measurement	4.5.1 Performance Measurement and Monitoring	ORM 3.3.2 (Not required to date)	Safety Performance and Metrics	SM – 2.7 SMS – 12.1
5.71 (a) Operational Processes and Systems	4.4.6 Operational Control	ORM 3.3.3 (Not required to date)	SMS Procedures List	SM – 2.3, 7.1 SMS – 10.0

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<p>5.71 (a) 3: Auditing of Operational Processes and Systems</p>	<p>4.5.2 Evaluation of Compliance 4.55 Internal Audits</p>	<p>ORM 3.4.1 A program that includes a detailed audit planning process and sufficient resources that provides for the auditing and evaluation of the management system of ground operations at all stations</p>	<p>Safety Audits</p>	<p>SM – 8.0, 9.1, - 9.4.3 SMS – 8.0</p>
<p>5.71 (a) 5-6: Accident and Incident Investigation</p>	<p>4.5.3 Incident Investigation, Nonconformity; Corrective and Preventive Action</p>	<p>ORM 3.2.4 (Not required to date)</p>	<p>Accident and Incident Investigation</p>	<p>SM – 13.7 SMS 7.0, 7.2</p>
<p>5.71 (a) 7: Employee Reporting</p>	<p>4.4.3 Communication, participation and consultation</p>	<p>ORM 1.4.1 System that ensures an exchange of information that is relevant to the conduct of ground operations and ensures that changes that affect operational responsibilities or performance are communicated ORM 2.2.5 Process that ensures that all documents pertaining to each operational area are communicated and distributed to all stations</p>	<p>Communication</p>	<p>SM – 2.3, 13.0 SM – 2.2.5, 27.2, 27.4.4, 28.0</p>
<p>5.73 Safety Performance Assessment</p>	<p>4.6 Management Review</p>	<p>ORM 1.5.1 Process to review the management system at intervals not exceeding one year to ensure continuing suitability, adequacy and effectiveness in the management and control of ground operations</p>	<p>Safety Management Review Management of Change</p>	<p>SM 1.1, 1.2, 2.3, 2.7, 3.1, 4.1, 4.2, 4.3, 4.7 SMS – 10.0</p>
<p>5.75 Continuous Improvement</p>	<p>4.5.3.2 nonconformity, corrective and preventive action</p>	<p>ORM 1.5.1 Management ensures deficiencies identified are addressed through the implementation to the organizational changes that will result</p>	<p>Non-conformance, Corrective and Preventive Actions</p>	<p>SMS – 8.1</p>

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		in improvements to the performance of the system		
Subpart E: Safety Promotion	4.5 Checking	ORM 3.5.2 (Not required to date)		SM – 2.3, 2.7, 9.4.3, 11.2.3 SMS – 4.1, 4.2, 4.3, 8.0,10.0, 12.0
5.93 Competencies and Training	4.4.2 Competence, training, and awareness	ORM Sections 5	Competence, Training and Awareness	SM Training Documentation throughout also G2 Ramp Manual. .
5.93 Safety Communication	4.4.3 Communication, participation and consultation	ORM 1.4.1 ORM 2.2.5	Communication	SM – 2.3, 4.4.3, 13.0
Subpart F: SMS Documentation and Recordkeeping	4.4.4 Documentation			
5.95 SMS Documentation	4.4.5 Control of Documents	ORM 2.1.1 System for the management and control of the internal and external documentation and/or data used directly in the conduct or support of operations.	Document Control	SM 0.3-0.7, 0.8, 0.9
5.97 SMS Records	4.5.4 Control of Records	ORM 2.3.1 Ensure content and retention is in accordance with applicable regulations and customer airlines requirements	Records Management	SM 39.1

3. Safety Policy

3.1. Safety Policy

3.1.1. G2 Secure Staff Senior Leadership sets the overriding objectives for regulatory compliance and safe work practices by supporting the Safety Policy. These senior leaders demonstrate their commitment to the Safety Management System by participating in reviews and ensuring that resources are available to implement, monitor, and continually improve the Safety Management System.



Safety Policy

G2 Secure Staff is committed to ensuring a **Non-Stop** safety and security culture that proactively identifies and manages risks. To achieve this culture, we will provision the necessary resources and personnel to operate an effective Safety Management System (SMS) according to these key values:

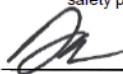
People – Collaborate with our employees and business partners to ensure a safe and healthy work place free from uncontrolled hazards;

- Strive to reduce occupational injury and illness risks through effective training, safe equipment and SMS procedures;
- Empower employees at every level of the organization that they have the responsibility to work safely and the authority to “**Stop The Process**” in order to prevent injuries or accidents from unsafe conditions or behaviors.


Service – Work with employees, business partners and airports to prevent customer injuries and damage to aircraft, equipment and facilities while delivering world class customer service.

Integrity – Expects employees to do the right thing at all times and in all circumstances;

- Meet or exceed all applicable regulatory requirements and customer expectations;
- Accurately report and maintain records required for safe operations;
- Establish annual goals to drive continuous improvement and monitor safety performance through regular management reviews.

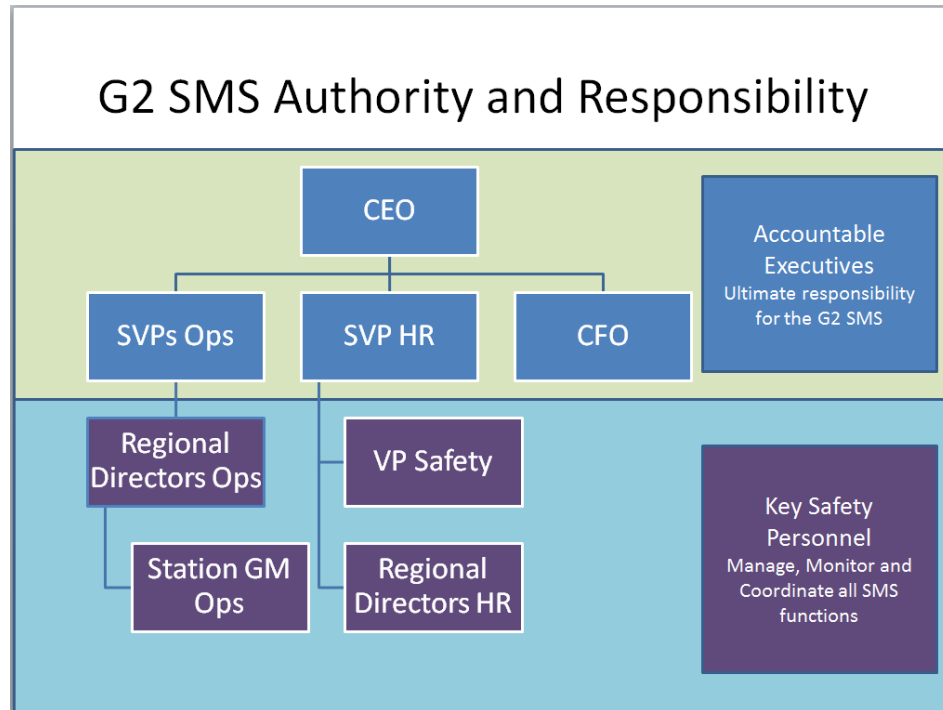


Dan Norman
 President and CEO



Issue A: 5/31/2017

3.1.2. The Safety Policy is the driver for implementing and improving the Safety Management System and Safety performance. This policy provides the framework for setting and reviewing Safety objectives and targets. The policy will be signed by the Chief Executive Officer (CEO) to reflect and communicate G2’s commitment to Safety compliance and continual improvement. The operation will communicate the Safety Policy to its employees and those persons working for or on behalf of the organization. The Safety Policy will be made available to the public either upon request or on the www.g2safety.org.



3.1.3.

4. Safety Risk Management

4.1. Safety Risk Assessments

4.1.1. Company-wide Risk Assessments will be conducted to evaluate the risks associated with the various operations G2 conducts across its network. The stations will implement the Safety Risk Assessment process to ensure the proper identification of risks, and the assessment of significance. Significant risks will be taken into account in establishing, implementing, and maintaining the Safety Management System.

4.2. Legal, Regulatory and Other Requirements

4.2.1. The Corporate Compliance and Safety teams will identify the Legal, Regulatory and Other Requirements applicable to G2. In addition it will track and ensure that the stations have access to regulatory, or other environmental, occupational health and safety, FAA, DOT, and TSA requirements to which the operation subscribes.

4.3. Objectives and Targets

4.3.1. The Safety team, driven by the senior leaders, will collect information from a variety of sources to set annual targets and objectives. The targets and objectives will be documented in scorecard format with assigned champions and target completion dates.

4.3.2. The stations will establish specific goals taking into consideration regulatory and other requirements, Corporate Safety scorecard goals, significant Occupational Health and Safety Risks, technological options and financial, operational and business requirements, and the views of interested parties. The Safety goals and associated responsibility for achieving them will be at the most relevant functions and levels of the operation.

4.3.3. The station Safety Goals will be tracked to ensure the designation of responsibility and accountability for achieving Safety goals, determination of key milestones (objectives) and (targets), and monitoring of performance to plan.

5. Implementation and Operation

5.1. Resources, Roles, Responsibilities and Authority

5.1.1. Senior Leadership Team

5.1.1.1. Consisting of but not limited to the CEO, CFO, and the SVPs represent the Accountable Executives and have the final authority to ensure the following:

5.1.1.1.1. Adequate financial and human resources required for the safe operation of G2's various services

5.1.1.1.2. SMS and the Safety Policy are properly implemented, shared, and regularly evaluated

5.1.2. The Vice President of Safety

5.1.2.1. Ensure that the SMS is established, implemented and maintained in accordance with FAA requirements with a goal to continuously improve the SMS.

5.1.2.2. Report on the performance of the Safety Management System to the appropriate Senior Leadership team for review and as a means for identifying improvements.

5.1.2.3. Ensure the promotion and awareness of safety throughout the organization to drive culture.

5.1.3. Regional Operations Directors;

5.1.3.1. Ensure the Operations Management at the stations are fully implementing the SMS, identifying hazards, escalating hazards they are not able to correct, timely reporting of all accidents and incidents, and timely completion of corrective actions assigned to them.

5.1.3.2. Report on the safety performance of their perspective region.

5.1.3.3. Ensure Safety promotion and support throughout their region.

5.1.4. Station General Manager/leader will;

5.1.4.1. Implement and maintain the SMS as it applies to his/her station.

5.1.4.2. Regularly report on the performance of the station's SMS to G2 Leadership.

5.1.4.3. Ensure that all station employees are fully trained prior to starting their employment with G2 and receive refresher training on the designated schedule.

5.1.4.4. Conduct an annual risk assessment of the stations operations and submit it to Corporate Safety

5.1.4.5. Obtain the stations general manager's signature and/or senior management team's signature on the Safety Management Systems Statement of Commitment, annually to demonstrate management commitment.

5.1.5. Roles, responsibilities and accountabilities required for the effective implementation, maintenance and continuous improvement of the Safety Management System are documented in each of the Management System procedures under section 3.

5.2. Competence, Training and Awareness

5.2.1. Stations will implement the necessary processes to ensure that Competence, Training and Awareness on essential functions occurs for all applicable employees. The Corporate Training team will identify and provide the training required to develop specific Safety skills, competence and awareness necessary to effectively and efficiently conduct operations in a safe, healthful and environmentally responsible manner.

5.3. Communication

5.3.1. The G2 management team will manage internal communication between the various levels and functions of the organization as well as responding to external inquiries from interested parties (i.e. community complaints, NGO inquiries, etc.). Communications can consist of electronic media such as emails, phone conversations, conference calls, webinars, and meetings.

5.3.2. In the event of a significant incident, immediate communications between the station General Manager, Regional Director, SVP of Ops and VP of Safety must take place.

5.4. Control of Documents

5.4.1. The SMS includes four primary levels of documents:

5.4.1.1. Safety Management Systems Manual – Describes the relationship between FAA and the G2 Safety Management System.

5.4.1.2. Management System Procedures – Defines the objectives, scope, persons or functions in the workplace responsible for aspects of the procedure over which they have control, and stipulates the operating criteria and preventive maintenance instructions for performing the required task.

5.4.1.3. Work Instructions – Provides step by step instructions for the front line employees to follow especially for non-routine or high risks tasks.

5.4.1.4. Records – Records are used to document the results and demonstrate that the Safety Management System is functioning adequately.

5.4.2. SMS_PRO2001, Document Control procedure defines how to prepare, approve, maintain and distribute SMS documents.

5.5. Operational Control

5.5.1. The SMS establishes, and maintains documented procedures to cover situations where their absence could lead to deviations from Safety regulations, policies and goals. These procedures are based on the aspects and risk assessment and on applicable regulations and other requirements. These procedures will stipulate operating criteria and include preventive maintenance elements. Relevant procedures will be communicated to affected parties, including but not limited to, suppliers and contractors.

5.6. Emergency Preparedness and Response

5.6.1. Sites will implement the defined emergency preparedness and response plans that identify the potential for, and response to, accidents and emergency situations, and for preventing and mitigating associated Safety risks. The site specific procedure(s) will be developed as necessary to ensure compliance with regulatory requirements and conformance with customer requirements and protocols..

6. Checking

6.1. Monitoring and Measurement

6.1.1. Stations will implement inspection systems to monitor and measure, on a regular basis, identified operations and activities that can have a significant Safety impacts. These include the recording of information to track Safety performance, identified hazards, and conformance with the Safety goals.

6.2. Non-conformity, Corrective Action and Preventive Action

6.2.1. Stations will track the Non-conformance and Corrective and Preventive Actions to ensure the proper handling and investigating of actual and potential non-conformances and for initiating, tracking, completing and reviewing the effectiveness of corrective and preventive actions. They will utilize the web-based CATS system www.g2safety.org

6.3. Control of Records

6.3.1. All records required by the SMS will be identified in section 7.0 of the applicable procedure. Stations will implement the SMS_PRO2002, Records procedure which defines the maintenance and disposition of records. Their retention times shall conform to the G2 Master Record Retention Schedule.

6.4. Safety Audits

6.4.1. The VP of Safety and the Director of Compliance and Communication will implement the Audit process for conducting internal audits of the Safety Management System and periodic documented evaluations of compliance. The process covers the scope, frequency, methodologies, and responsibilities for conducting the assessments and reporting results.

7. Management Review

The VP of Safety defines performance measures to guide progress and evaluate the results of the Safety Management System implementation. The Vice President of Safety and each station general manager/leader will conduct documented reviews at least annually to report on the progress towards Safety goals and performance of the Safety Management System in conformance with the Management Review process.

8. Revision History

Issue	Date	By	Description of Change and/or DCN#
F			
E			
D			
C			
B	3/29/2018	C. Wales	Initial Release of this new document which comprises the essential requirements identified in the FAA Requirements noted in 14 CFR Part 5. A DCN is not necessary due to the substantial changes of the document constituting essentially a new document. All further revisions will contain a DCN.
A		P. Mann	

9. Approval

Approved By:

Curtis Wales

3/29/2018

Curtis Wales

Date

Vice President, Safety
 G2 Secure Staff

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