Item:

Development and Infrastructure Committee: 10 September 2024. Civil Aviation Authority – Desktop Audit.

Report by Corporate Director for Enterprise and Sustainable Regeneration.

1. Overview

- 1.1. As a licensee for the North Isles airfields, the Council is subject to a Civil Aviation Authority (CAA) inspection annually, alternating between an aerodrome audit one year and a desk top audit the following year.
- 1.2. The airfield inspections carried out in September 2022 were reported to the Committee on 7 February 2023.
- 1.3. A desktop audit was carried out in October 2023 which found no Level 1 non-compliance items across the six airfields but identified five Level 2 findings and five observations as detailed in section 4 below.
- 1.4. Following responses to the findings and observations from the CAA, the desktop audit was closed on 31 May 2024. The CAA oversight report is attached at Appendix 1 to this report.

2. Recommendations

- 2.1. It is recommended that members of the Committee:
 - Scrutinise the CAA Oversight Report, attached as Appendix 1 to this report, together with the status of audit findings and observations detailed in section 4, in order to obtain assurance that action has been agreed or taken where necessary.

3. Background

3.1. Aerodrome inspections and the closing of remedial actions are a condition of the Aerodrome Operating Licence. Failure to close out remedial actions to an agreed schedule, and/or the issuing of a Level 1 non-compliance creating a significant safety hazard, will result in the withdrawal of certification and the resultant closure of Orkney Islands Airfields.

- 3.2. Level 1 non-compliance creating a significant safety hazard will be reported to the Accountable Manager for action if a major failure of compliance has been identified with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14 or Civil Aviation Publication (CAP) 168.
- 3.3. If any Level 1 items are reported, the major failure of compliance must be rectified immediately or within the short timescales indicated. Failure to do so will result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence.
- 3.4. Level 2 items will be reported to the Accountable Manager for action if it has been identified that the Aerodrome is not in full compliance with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14, Civil Aviation Publication (CAP) 168 or the Aerodrome Manual.
- 3.5. If any Level 2 items are reported, the CAA Aerodrome Oversight team must be informed that these items have been rectified by the dates agreed with the aerodrome during the inspection and shown in the Latest Correction Date Box. Failure to rectify any items within the agreed time scale may result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence.
- 3.6. An observation may be raised where there is potential for future non-compliance if no action is taken, or where the CAA may wish to indicate an opportunity for safety improvement or something that is not good practice. Corrective action is not obligatory for an observation, but acknowledgement and the identification of any intended action is expected. If the Council reject an observation, then the licensee must justify their rationale.

4. Desktop Audit Findings and Observations

4.1 Overall, the feedback has been positive from the CAA inspections, recognising the commitment of the Council to continuously improve and maintain the airfields in a safe, fit for purpose condition. The desktop Audit Level 2 findings and observations are summarised as follows:

Requirement	Details	Action	
<u>Findings</u>			
CAP 168 Chapter 9 – Emergency Planning.	The manuals state that the Multi Agency Exercises will be carried out annually to test the emergency procedures. Due to staff changes and resources this had not occurred.	Multi Agency Exercise to be held in Westray in July 2024.	
Appendix 2C Aerodrome Safety Management System.	Regularity of Safety Action Group.	Now scheduled to take place every 2 months.	
CAP 168 – Chapter 4 The Assessment and Treatment of Obstacles.	Annual check surveys to be carried out and submitted to NATS. Should there be no changes then a no change declaration form should be submitted.	Survey reports completed for all six airfields.	
Appendix 2C Aerodrome Safety Management System.	Manual states that all staff will receive basic ASMS training, with refresher training delivered annually.	Training now completed.	
Aerodrome Manual – Safety Management System – Training and Competence.	At the time of the desktop audit, a significant amount of training was found to be out of date, particularly the annual First Aid and Water Rescue Training. It was noted that training had been cancelled on a number of occasions due to weather related disruptions.	Training now up to date for all crew members (with the exception of those on long-term sick etc).	
<u>Observations</u>			
CAP 168 – Chapter 2 – Appendix 2C: Accountable Manager.	It was noted that there was a change in Accountable Manager since previous audit and that attendance of the CAA Accountable	Corporate Director, Head of Service and Service Manager have completed	

Requirement	Details	Action
	Manager course was	CAA Accountable
	recommended.	Manager course.
Safety Management	The desktop audit noted that the	SPI's agreed for the
Systems.	Council's Safety Performance	current year.
	Indicators had not recently been	
	reviewed.	
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Wildlife Hazard	Amendments to Wildlife	Updates carried out to
Management.	Management Manuals noted.	manuals. Surveys to be
		carried out at each
		aerodrome.
Aerodrome Inspection.	Removal of runway from form.	Complete.
Aerodrome Manual.	Updates to manuals required.	Updates completed.

- 4.2 The updates were completed by the Airfield Superintendent and team to address the findings and observations raised. The CAA closed the audit on 31 May 2024.
- 4.3 The CAA have confirmed that the next Inspection of Council Airfields will be from 13 to 15 August 2024. Completion of reports for each airfield are required prior to the CAA arrival, highlighting the rigorous process involved with adhering to CAA inspections and desk top audits.
- 4.4 An Accountable Manager meeting was held on 19 April 2024 with the Corporate Director and Airfield Superintendent with the CAA Aerodrome Inspector. The aim of the meeting was to discuss the safety performance and to discuss safety risks so that they can be minimised.
- 4.5 Safety Review Board meetings are also held every four months with officers and the Chair and Vice Chair of the Development and Infrastructure Committee to discuss any areas of concern and how these would be reduced or resolved.

For Further Information please contact:

Laura Cromarty, Service Manager (Transportation), extension 3638, Email laura.cromarty@orkney.gov.uk

Implications of Report

1. Financial

There are no financial implications arising directly from the recommendations of this report.

Landing fees are charged in accordance with the Council Charges Register:-

Charging Register 2024-2025 (1).pdf

2. Legal

The Council requires to comply with the requirements of its Aerodrome Operating Licence.

3. Corporate Governance

Not applicable.

4. Human Resources

The CAA audit and inspection process is to ensure a safe operation which includes the safety of the airfield staff employed by the Council.

5. Equalities

An Equality Impact Assessment is not required for performance monitoring.

6. Island Communities Impact

An Island Communities Impact Assessment is not required for performance monitoring.

7. Links to Council Plan

	The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
	☐ Growing our economy.
	☐ Strengthening our Communities.
	☑ Developing our Infrastructure.
	☐ Transforming our Council.
8.	Links to Local Outcomes Improvement Plan
	The proposals in this report support and contribute to improved outcomes for
	communities as outlined in the following Local Outcomes Improvement Plan
	priorities:

 \square Cost of Living.

⊠ Sustainable Development.

⊠Local Equality.

9. Environmental and Climate Risk

The CAA audit and inspection process identifies some environmental risks which could be addressed by the Council.

10. Risk

The CAA audit and inspection process identifies any risks to the Council so that they can be dealt with appropriately.

11. Procurement

Not relevant to the recommendations of this report.

12. Health and Safety

The CAA audit and inspection process identifies key health and safety concerns so that they can be dealt with appropriately.

13. Property and Assets

Orkney Islands Council is responsible for the six Outer North Isles airfields and associated airfield terminal buildings and for ensuring compliance with current CAA legislation.

14. Information Technology

Not relevant to the recommendations of this report.

15. Cost of Living

Not relevant to the recommendations of this report.

List of Background Papers

CAP 168 - CAP 168: Licensing of Aerodromes | Civil Aviation Authority (caa.co.uk).

Appendix

Appendix 1 CAA Oversight Report – Closed.



Oversight Report

Report Date: 31 May 2024

Details

Audit Reference NumberOrganisation NameADR.153Orkney Islands Council

Lead Auditor Audit Type

David Hindson AAA\Aerodromes\Desktop\Ongoing Oversight

Dates

Start Date End Date Closed Date

26/10/2023 30/10/2023 31/05/2024

Overview

A periodic Desktop audit was conducted at Eday, North Ronaldsay, Papa Westray, Sanday, Stronsay and Westray to verify continued compliance with aerodrome licensing requirements set out in the Civil Aviation Publication (CAP) 168 'Licensing of Aerodromes', the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14 and the Aerodrome Manual.

The Accountable Manager should confirm rectification of Findings to the relevant Aerodrome Inspector by the Target Date shown.

Although corrective action is not obligatory for an observation, acknowledgement and any intended action should be notified to the relevant Aerodrome Inspector by the Target Date shown. If you reject an observation, please provide your rationale.

Audit Scope

Licensing Documentation

Safety Management Systems

Surveys

Runway/Taxiway Incursion Prevention

Minimum Scale of Services to be provided

Level of Protection

Remission

Minimum number of Staff Designated as RFFS Personnel

Training

CAA Audit Team

Greg Feighan

David Hindson

Findings

Findings

Number	ADR.4991	Requirement	CAP 168 - Chapter 9 Emergency Planning
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Details

CAP 168 Chapter 9 - Emergency Planning

Whilst reviewing the Airport Safety Management Manual, section 18.1 stated that Multi Agency Exercises will be carried out annually in order to test the emergency procedures. It was evident that this had not occurred.

During the last audit in September 2022, Orkney Island Council (OIC) were going to look into adopting a modular approach to testing their emergency procedures, with the intention to operate a full scale live exercise every 4 years. OIC should provide the CAA Aerodrome Inspector with a copy of their proposed procedure.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1. OIC has taken the decision to adopt the modular approach to Multi Agency Exercises with a full-scale live exercise every 4 years. The next full-scale exercise will take place during the summer of 2024, with modular exercises in the summers of 2025, 2026, 2027 and another full-scale exercise in 2028 and so forth. The full-scale exercise will take place at a different one of the six aerodromes each time but with key stakeholders from each of the six OIC aerodromes present as observers at each exercise. Subsequently, debrief discussions of the exercise will be held at each of the six aerodromes during the 3 months following the exercise, so that each aerodrome's team can gain an understanding of the exercise and the lessons learnt. Proposed procedure attached. EMAIL 1

Level	Status	Target Date	Closure Date	Raised By
2	Closed	14/02/2024	13/02/2024	David Hindson

Number	ADR.4992	Requirement	Appendix 2C Aerodrome Safety Management System
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Details

Safety Management System - Safety Committees

Whilst reviewing Orkney Island Councils Airfield Safety Management Manual (version 3.1, dated 24th August 2023), paragraph 16.2 stated that the Safety Action Group met every two months. Although the OIC stated that these meetings were still taking place, there was no documented minutes as evidence, with the last minutes being dated on the 15th August 2022.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1. The most recent Safety Action Group meeting was held on 18th December 2023. These are scheduled to take place every two months. The next one is scheduled for 19th February 2024. Minutes of December meeting attached. EMAIL 1

ı	Level	Status	Target Date	Closure Date	Raised By
	2	Closed	14/02/2024	13/02/2024	David Hindson

Number	ADR.4993	Requirement	CAP 168 - Chapter 4 The assessment and treatment of obstacles
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Details

CAP 232 Annual Check Survey

Section 4, paragraph 4.1 of all Aerodrome Manuals states that all surveys are submitted to NATS and that should there be no changes, a no change declaration form is submitted. At the time of the desktop audit, there was no evidence to confirm that an annual check survey had taken place in accordance with CAP 232 and no record of any no change declaration form being submitted to NATS.

Extended by DH on the 15th December 2023 - A copy of the 2021 Survey reports for all six airfields were provided, where it was agreed that OIC will perform an annual check survey in March 2024. In the meantime a visual inspection of the obstacle environment surrounding all six airfields shall be undertaken to ensure that there has been no significant changes in the obstacle environment. See correspondence entitled "20231212 - OIC Response to level 2 finding ADR.4993 CAP 232 Surveys and Annual Check Surveys"

Closed by D. Hindson on the 23rd April 2024. See correspondence from OIC entitled: "20240423 OIC Close Out Evidence for ADR.4993 - CAP232 Annual Check Survey No Change Declarations and Aerodrome Plans 2024", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
2	Closed	30/04/2024	23/04/2024	David Hindson

Findings

Number	ADR.4994	Requirement	Appendix 2C Aerodrome Safety Management System
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Details

Safety Management System - SMS Training

Whilst reviewing version 3.1 (dated 24th August 2023) of the Orkney Island Councils (OIC) Airfield Safety Management Manual (ASMS), section 4, paragraph 1.1 states that all airfield staff, including senior management, will receive basic ASMS training, with refresher training delivered annually. It became evident during the desktop audit that this training had not been complete and therefore a non-conformance against the ASMS.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1, which have been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
2	Closed	15/02/2024	13/02/2024	David Hindson

Number	ADR.4995	Requirement	Aerodrome Manual
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Details

Safety Management System - Training and Competence

At the time of the desktop audit, the training records for all six Airfield's were reviewed, where a significant amount of training was found to be out of date, particularly the annual First Aid and Water Rescue Training. OIC shall create a training schedule to ensure that this training is delivered appropriately and within timely manner, ensuring that all training records are maintained within date.

Extended by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1, which have been uploaded to SPO. It was noted that staff changes and weather had resulted in delays in some of the training being delayed. OIC should ensure that all training is kept in date in line with the their training programme.

Closed by D.Hindson on the 31st May 2024 - See correspondence from Symeon Grayson entitled: "20240529 OIC Audit Close Out Evidence - ADR 4995 SMS Training and Competence", which has been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
2	Closed	31/07/2024	31/05/2024	David Hindson

Observations

Number ADR.4990 Requirement CAP 168 - Chapter 2 - Appendix 2C: Accountable M
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Details

OBSERVATION: Safety Management System - Change in Accountable Manager

A recent change had taken place at the Orkney Island Council, where Gareth Waterson (Corporate Director - Enterprise and Sustainable Regeneration) has since replaced Gavin Barr as Accountable Manager. It is highly recommended that the new Accountable Manager attends a CAAi Accountable Manager course, in order to fully understand the CAA's performance based oversight process.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1, which has been uploaded to SPO. Gareth Watson plans to attend the CAA Accountable Manager Course on the 1st May 2024.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	14/02/2024	13/02/2024	David Hindson

Number	ADR.4791	Requirement	Safety Management Systems
Details			

OBSERVATION: Safety Management System

Whilst reviewing version 3.1 of the Orkney Island Councils Airfield Safety Management System, dated the 24th August 2023, the following observation was made:

1. Annex A referred to the OIC Safety Performance Indicators, which were dated back to 29th September 2016. I would imagine that these SPI's have since been reviewed and if so the date of the review should reflect the SPI's that have been agreed for the current year.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	14/02/2024	13/02/2024	David Hindson

Number ADR.4790 Requirement Wildlife Hazard Management

Details

OBSERVATION: Wildlife Hazard Management

Whilst reviewing the Wildlife Management Manuals for all six aerodromes, the following observations were made:

- 1. Although reference to CAP772 for wildlife hazard management is correct, all reference to paragraphs within CAP772 shall be removed as the updated version of CAP772 no longer refers to paragraph numbers.
- 2. It was good to see that each aerodrome has performed a 0.5km and 4km wildlife survey in order to better understand the various wildlife hazards, however, it is unclear as to when the last survey was carried out, where each aerodrome should consider performing an updated survey to ensure that the details recorded within the manual are accurate / current.
- 3. Version 6.5 of Papa Westray's Wildlife Management Manual dated 10th July 2023 illustrates a copy of the birdstrike occurrence form on page 25. It was noted that the e-mail address detailed at the bottom of the form was Malcolm Parsons e-mail address and as Malcolm has now left the business, the e-mail address shall be updated to reflect the generic e-mail address: airfields@orkney.gov.uk
- 4. Section 3, paragraph 8.6 of Sanday's Airfield Wildlife Management Manual (version 6.5, dated 28th June 2023), states that Sanday operate a long grass policy in accordance with CAP772, however, it also states that as a trial Sanday operate a short grass policy. Sanday should confirm their chosen grass policy and should this not comply with the guidance detailed within CAP772, supporting evidence and a risk assessment shall be provided to the CAA Aerodrome Inspector.
- 5. Some of the manuals made reference to the use of a Mark 3 Gas gun being used as a wildlife dispersal method. It was confirmed that these were no longer in use and should therefore be removed from the manuals.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 1 and 2, which have been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	14/02/2024	13/02/2024	David Hindson

Number ADR.4789 Requirement Aerodrome Inspection

Details

OBSERVATION: Airfield Monitoring and Inspection

Whilst reviewing version 6.5 of Eday's Airfield Record Book dated 20th July 2023, it was noted that record sheet number 1 used to record all runway inspections referred to Runway 18-36; as this is no longer an active runway, these runway designators shall be removed from the form.

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail 4, which have been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	14/02/2024	13/02/2024	David Hindson

Number ADR.4788 Requirement Licensing Documentation

Details

OBSERVATION: Aerodrome Manual

At the time of the audit, the Aerodrome Manuals for all six aerodromes were in draft, where all final versions of each individual manual shall be sent to asddocs@caa.co.uk to ensure that all current versions are recorded within the CAA SharePoint site.

Whilst reviewing the Aerodrome Manuals, the below observations were raised:

- 1. Section 1, paragraph 1.10 of all Aerodrome Manuals refer to the below CAP documentation, which are no longer in use and should therefore be removed / replaced:
- a. CAP 032 UK Aeronautical Information Publication remove reference and refer to NATS AIS website NATS UK.
- b. CAP 382 Mandatory Occurrence Reporting Scheme remove reference and refer to CAA website Occurrence reporting | Civil Aviation Authority (caa.co.uk) for UK Reg 376/2014. Reference may also be made to CAP 1496, which provides guidance on how to use the ECCAIRS2 aviation reporting portal.
- c. CAP 576 Aerodrome Model Emergency Orders remove reference as document has now been withdrawn.
- 2. All Aerodromes shall review section 2, paragraph 2.3 to ensure that the aerodrome reference point (ARP) longitude and latitude coordinates and aerodrome elevation are correct and aligned to their most recent survey and AIP entry.
- 3. Section 2, paragraph 2.8 should be reviewed to ensure that the organisation chart reflects the current OIC structure. It was noted that some aerodromes still refer to Gavin Barr as the Accountable Manager and Malcolm Parsons as the Airfield Manager.
- 4. Section 3, paragraph 3.5 states that the CAA Aerodrome Inspectors will measure the runway declared distances. This should be removed and should form part of your annual CAP 232 survey, where any changes to the declared runway distances are communicated to AIS NATS via Aurora to ensure that the AIP is amended and an SRG2006 is submitted to developments@caa.co.uk along with an updated CA1560C form detailing the updated runway declared distances.
- 5. Section 4, paragraph 4.15 refers to an old CAA SRG1601 form which is no longer in use. Should OIC want to continue using this form as an internal form for recording all details of an incident prior to filing an MOR via ECCAIRS2, they should remove any reference to CAA. This paragraph also makes reference to CAP382, which is no longer a live document and should be removed and replaced with UK Regulation 376/2014. IR 2015/1018 provides a list of all occurrences that shall be reported as an MOR.
- 6. AOI 10 also refers to CAP382, which shall be replaced with UK Regulation 376/2014. This AOI also states that all MOR's shall be filed 96 hours from the time of the incident, this is incorrect and should state 72 hours.
- 7. Version 7.1 of North Ronaldsay's Airfield Manual dated 7th July 2023 displays an airfield illustration on page 26 which refers to Runway 14-32, this should be amended to state runway 13-31.
- 8. Section 3, paragraph 3.6 of Papa Westray's Airfield Manual (version 6.9, dated 10th July 2023) makes reference to runway 04-22, which does not align with the AIP entry. All references to runway 04-22 shall be changed to runway 03-21.
- 9. Section 10 of Papa Westray's Airfield Manual (version 6.9, dated 10th July 2023) details AOI 4, where reference is made to the old CAA 1282 form for reporting birdstrikes, this should be removed, and reference made to OIC Birdstrike Occurrence form detailed within their Airfield Record Book.
- 10. Section 3 of Westray's Airfield Manual (version 6.9, dated 10th July 2023) makes reference to runway 08-26 on the CA1560C runway declared distance forms detailed on pages 29 and 30. These forms shall be amended to state runway 09-27.
- 11. Section 6 of North Ronaldsay's Airfield Manual states that runway 10/28 has been extended by 60m. As this extension occurred back in 2012, this can be removed from the manual.

Note that the above list is not exhaustive, and that a thorough review of all manuals shall be undertaken prior to submitting the final versions of each manual to asddocs@caa.co.uk

Closed by Aerodrome Inspector D. Hindson on the 13th February 2024 - see correspondence entitled "20240209 OIC Airfields Audit Response Document" and supporting E-Mail's 5 and 6, which have been uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	14/02/2024	13/02/2024	David Hindson

Definition of Findings

LEVEL 1 (ONE) NON-COMPLIANCE CREATING A SIGNIFICANT SAFETY HAZARD

Level 1 items will be reported to the Accountable Manager for action if a major failure of compliance has been identified with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14 or Civil Aviation Publication (CAP) 168.

If any Level 1 items are reported, the major failure of compliance must be rectified immediately or within the short timescales indicated. Failure to do so will result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence.

LEVEL 2 (TWO) NON-COMPLIANCE

Level 2 items will be reported to the Accountable Manager for action if it has been identified that the Aerodrome is not in full compliance with the aerodrome licensing requirements set out in either the Air Navigation Order, the Aerodrome Licence, ICAO Annex 14, Civil Aviation Publication (CAP) 168 or the Aerodrome Manual.

If any Level 2 items are reported, the CAA Aerodrome Oversight team must be informed that these items have been rectified by the dates agreed with the aerodrome during the inspection, and shown in the Latest Correction Date box. Failure to rectify any items within the agreed time scale may result in the CAA having to take regulatory action, which could result in suspension of the Aerodrome Licence.

OBSERVATIONS

An Observation may be raised where there is potential for future non-compliance if no action is taken, or where we wish to indicate an opportunity for safety improvement or something that is not good practice. Corrective action is not obligatory for an observation, but acknowledgment and the identification of any intended action is expected. If you reject an observation, please justify your rationale.

Report issue	
Issued to	Original Report Issue Date
Symeon Grayson	23/11/2023