Passenger welfare at times of major disruption - guidance for UK airports

CAP 1244

Contents

Chapter 1
Introduction

1.1   Air travel is a complex consumer service, bringing together multiple stakeholders, including airports, airlines, travel agents, ground handlers, air traffic controllers, security and border control, caterers, surface transport providers and maintenance services. Most of the time, these organisations interface seamlessly, providing a hassle-free experience to the vast majority of the 230 million passengers who fly in and out of the UK every year.

1.2   However, complexity also means that when things go wrong, the impact on passengers can be particularly severe. The industry has hit the headlines for the wrong reasons a number of times in recent years, for example:

- Global chaos caused by the Eyjafjallajökull ash cloud in spring 2010, followed by major European airports struggling during periods of heavy snowfall later in the year.

- Computer failures at NATS in December 2013 led to the grounding of hundreds of UK flights, while flooding at Gatwick a few weeks later on Christmas Eve seriously disrupted thousands of passengers' travel plans.

- During the 2014 summer holiday season, baggage handling problems at Heathrow and Gatwick caused significant inconvenience and distress to passengers.

1.3   Such events have sparked considerable political interest in aviation's resilience. Three independent reviews of the issue have been published in the last four years: the Department for Transport's (DfT) reviews of aviation and other transport modes' responses to snow (2010) and other extreme weather events (2014), and the Transport Select Committee's inquiry into events at Gatwick on Christmas Eve 2013 (2014).

1.4   In all three publications, recommendations for improvements in the aviation sector largely focused on airports. This reflects their status as physical 'pinch points' in the system, where multiple stakeholders come together, as well as their role as a central provider capable of coordinating many of the activities of those stakeholders.

1.5   By managing the causes and consequences of disruption effectively and efficiently – which may include coming to arrangements with airlines to help them discharge their specific legal responsibilities – airports will ensure they fulfil their own duty of care to passengers. In doing so, they will not only provide passengers with the service they expect, but also reduce the risk of political interest turning into demands for regulatory intervention to improve resilience, and help to avoid significant financial and reputational damage to their own organisations and to the wider aviation sector.

Purpose of this guidance

1.6   In response to the issues and challenges set out above, the Civil Aviation Authority (CAA) and the Airport Operators Association (AOA) have developed a set of key principles and recommended practices to help airports check they have the right type of procedures and plans in place to deal with disruption, and provide useful suggestions and reassurance as to how airports can plan ahead. This will help ensure that passengers get the outcomes they expect when travelling by air.

1.7   The UK's airports vary greatly in terms of their size, capacity, passenger mix, proportion of transfer passengers, and transport and other surrounding infrastructure. We have therefore been careful to focus on core principles that we think all airports – in cooperation with airlines and other stakeholders – should adopt to inform their approaches to addressing the risks and impacts of disruption.

1.8   At Heathrow and Gatwick, which, as large airports with market power, are covered by the Civil Aviation Act 2012 licensing regime, the principles identified in this guidance are largely already implemented, or are in the process of being implemented. In line with their licence conditions, both airports published operational resilience plans in October 2014.

1.9   This guidance is, therefore, mainly intended to support airport boards, management and operational staff at the UK's other large airports (which we define as serving over one million passengers a year[1]), where the CAA has no powers to regulate resilience. The principles, which often reflect existing arrangements at many airports, have been voluntarily agreed and are sufficiently flexible to allow businesses to identify the best ways to adopt them, as should be the case in a competitive market. Examples of how airports take different approaches to managing the same disruptive

---

1   Table 01, CAA UK Airport Statistics

event can be found in the AOA's 2014 Snow Planning Survey. Sections 2
(on management) and 3 (on communications) reflect many of the principles
in these guidelines.

Basis for this guidance

1.10   This document draws heavily on a 2014 report for the CAA by the
        independent transport consultancy Steer Davies Gleave (SDG). SDG was
        commissioned by the CAA to assist it in developing licence conditions for
        operational resilience at Gatwick and Heathrow, but many elements of the
        best practice specification it produced are applicable to other airport
        operators.

1.11   We have also sought to reflect the recommendations made in the Transport
        Select Committee report on the events at Gatwick on Christmas Eve in
        2013, and DfT's independent Transport Resilience Review, published in
        2014.

1.12   Airports should also consider the guidance provided within the international
        standard ISO 22301:2012. Certification to this standard will demonstrate
        the airport's commitment to business continuity, including the overarching
        need to take account of customer welfare.

Chapter 2
What do passengers expect?

2.1   Airports are complex operations where many different organisations interact. However, what unites them is that they are all there to provide, either directly or indirectly, a service to passengers. It therefore makes sense to start with a clear, jointly agreed view of what all passengers expect when they travel by air, and then identify and address the risks that could prevent their expectations from being met.

2.2   At the most basic level, regardless of who they fly with and how much they pay for their ticket, consumers travel by air with a justifiable expectation that they and their baggage will be safely transported from their point of departure to their point of arrival at the expected time. If this does not happen, and they still wish to travel, passengers expect to be looked after until they can take their flight. What this means for individual passengers depends on the degree of disruption experienced, but it should be possible to establish a simple order of needs:[2]

- Information about the status of their flight can provide certainty and reassurance to passengers. Providing information at the earliest possible opportunity can prevent people travelling to the airport before they need to. If passengers are already airside then clear and timely information can provide reassurance and help keep them calm.

- A clean and comfortable environment to wait in until their flight is ready to depart, with clean and hygienic facilities.

- Access to free drinking water and reasonably priced food. For significant delays (i.e. over two hours), airlines are obliged to ensure passengers have access to suitable refreshments.

- The ability to communicate easily, as well as the ability to find out about or rearrange their onward travel arrangements at their destination. Again, with significant delays airlines are obliged to provide access to communications.

---

2   This order of needs broadly reflects the findings of a 2014 survey by the CAA (unpublished). This one-off survey on the passenger experience during disruption was conducted as an add-on to the CAA's Passenger Survey. Approximately 2,500 interviews were conducted at Heathrow, Manchester, Gatwick, Luton, and Leeds-Bradford airports.

- Accommodation, and transport to and from it, if disruption continues overnight, including being able to return home if practical. Once more, this is legally the obligation of airlines.

- The ability to easily make a complaint and obtain redress (including financial compensation if appropriate) at a later date, usually once the passenger has completed their journey.

- Confidence that steps will be taken to provide a better experience the next time they fly, leading to future purchases.

2.3   The legal responsibilities of airports and airlines are set out in the following subsection. However, the primary concern for passengers is not who looks after them but that they are looked after. Airports, airlines and other service providers must therefore collectively ensure the welfare of passengers in situations of disruption. This is best delivered cooperatively between the organisations and approaches to managing risk, contingency plans and delivery mechanisms, passenger communication, practice events and learning lessons must be designed to encourage and facilitate such cooperative behaviours.

2.4   Procedures for how airports will deal with situations where airlines do not fulfil their obligations to passengers should be set out clearly and communicated with airlines. Airlines should be given the opportunity to fulfil their obligations using their own resources before any remedial airport action is implemented, unless other arrangements have been agreed in advance.

Legal framework

2.5   Regardless of the practicalities, it should not be overlooked that the passenger's contract – and therefore the legal responsibility for looking after them – is not with the airport but the airline. As highlighted above, under EU Regulation EC261/2004, airlines have specific obligations to passengers whose flights have been disrupted, including the provision of food and drink, the means to contact friends and family, and overnight accommodation (including transport to and from it) if necessary. Under EC261/2004, airlines must give priority to disabled people and people with reduced mobility (PRMs), and unaccompanied children when discharging their responsibilities.[3]

---

3   There is more information about legal rights during disruption at the Resolving Travel Problems area of the CAA website: http://www.caa.co.uk/default.aspx?catid=2226&pageid=15601

2.6   The CAA is responsible for ensuring compliance by airlines with EC261. In October 2014 it informed the 15 largest airlines serving the UK that they would be required to report over the next 18 months on their level and method of compliance with their obligations to provide information on legal rights and welfare to disrupted passengers. The CAA intends to publish a compliance report annually covering these areas.

2.7   However, under the Occupiers Liability Acts for England and Wales (1957), Northern Ireland (1957) and Scotland (1960), airports do have a duty of care to ensure that visitors will be reasonably safe at all times when using their premises. At a minimum, this means taking steps to protect people from the health and safety consequences that can result from disruptive events. These include overcrowding, extreme temperatures, wet and slippery floors, food and drink not being available, unclean toilets and the build up of litter. Such problems can be exacerbated by the way airports are, for security reasons, split into landside and airside areas: if passengers are already airside they cannot easily leave the airport site and are essentially 'captive'; if they are landside they may be unable or unwilling to leave the airport because surface transport is unavailable or there is uncertainty about their flight status.

2.8   Airports also have responsibilities under EU Regulation EC1107/2006 to assist disabled people and PRMs to move around the airport and embark and disembark aircraft. These responsibilities apply equally during normal operations and times of disruption. Again, ensuring compliance with EC1107/2006 is the CAA's responsibility.

Chapter 3
Good practice principles

3.1   This guidance endorses the view presented in the 2014 Transport Resilience Review that resilience has three layers to it[4]:

- Firstly, it is about increasing physical resilience to the causes of disruption, so that when disruption is experienced, people and goods can continue to move.

- It would be both very difficult and prohibitively expensive (and therefore not in the interests of passengers) to ensure total physical resilience, so secondly it is equally about ensuring processes and procedures to restore services and routes to normal as quickly as possible after disruptive events have abated.

- Thirdly, it is essential to ensure clear and effective communications to passengers and transport users so that the impact of disruption on people and businesses is minimised.

3.2   The model set out above, which also emphasises the importance of clear and effective communications, describes a widely recognised approach to business continuity management (BCM). BCM describes a set of processes to avoid or reduce the risk of disruptive events taking place by targeting the *causes*, and a further set of processes to manage and mitigate the *impacts* of such events when they do occur. These two sets of processes often appear in the risk management literature as a 'bowtie' diagram (see Figure 1, below).

---

4   While the context for the Review was extreme weather, the model has wider application to all causes of disruption.

Figure 1: Bowtie diagram
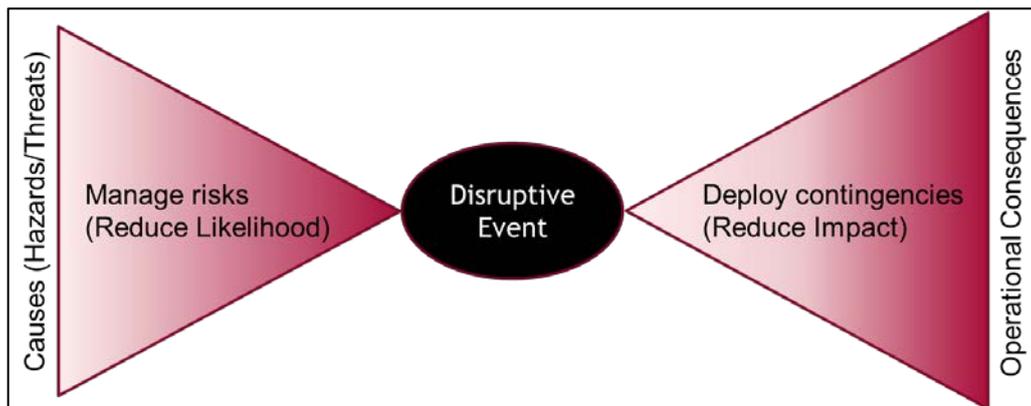
3.3   This guidance is not intended to reinvent the wheel on risk management, or dismantle businesses' existing, longstanding approaches to the issue. Instead, the six principles set out in the remainder of this document (and summarised in Table 1, along with the key recommended practices) are primarily designed to help airports ensure that current processes operate in the most effective and constructive manner possible.

3.4   The CAA believes that the most fundamental principle is the first, Collaborate. Because of the complex nature of airport operations, without effective collaboration between all relevant service providers, the effectiveness of the other five principles in delivering the outcomes that passengers expect is likely to be significantly undermined.

Table 1: Summary of principles and recommended practices for airports

Principle	Recommended practices
Collaborate	▪ Ensure effective interaction between the different organisations operating at the airport. ▪ Involve key stakeholders at all key stages of business continuity management: risk management; contingency planning and deployment, passenger communication; practice events; and learning lessons. Even if they do not wish to participate, the important thing is that they should be aware of the process, and have had the opportunity to participate.
Manage risks	▪ Regular risk identification exercises are necessary given the changes to airport activities and context, with evidence from other major strategic industries suggesting that annual reviews are the norm. ▪ Involve all major airport stakeholders at an airport in risk identification exercises. Airports should lead the exercise and remain responsible for overseeing the implementation of any risk mitigation measures agreed. ▪ Consider how widely to consult on airport capital programmes: consulting with stakeholders other than major airlines may provide different perspectives on their investment proposals. ▪ Consider how risks can be controlled through operational procedures, as well as capital investment.
Plan and deploy contingencies	▪ Contingency plans should function both as pre-existing documents and as a set of processes for managing events on the day. ▪ Consider an overarching contingency plan for the airport, or major part of it, detailing the general principles to be followed when an event occurs, accompanied by more detailed plans covering specific consequences. ▪ As many different disruptive events (e.g. snow, industrial action) are likely to lead to similar consequences, contingency plans should be focused on managing consequences, not on the events themselves. ▪ Major airport stakeholders should have the opportunity to feed into plans, in order to ensure that there are plans in place to address significant consequences to all parties. ▪ Ensure that contingency plans provide relevant information on: who should be involved in managing the situation; what checks should be undertaken to understand the extent of the problem; options for handling the situation; key information relevant to any selected option; rules for interaction with the Command and Control arrangements and with other

Principle	Recommended practices
	stakeholders; recovery processes for moving back towards normal operations.
	▪ Judge contingency planning on whether: there is an overarching plan, underpinned by a set of plans covering all major consequences of disruptive events, based on the risk assessment process and general experience; the plans provide necessary information for their recipients; they are available to all those needing access; are set out clearly and conducive to use in stressful situations; and are capable of being applied to sustained periods of disruption, as well as shorter-term events.
	▪ Share plans with significant impact on other stakeholders (such as airlines) with those organisations for information and comment.
	▪ As well as considering the strengths and weaknesses of the plans themselves as they exist at any one time, consider the processes for developing the plans, including the link to the risk assessment, the involvement of all relevant stakeholders, and processes for monitoring, review and improvement.
	▪ Review plans regularly and involve major stakeholders in such reviews.
	Command and control (C&C) arrangements
	▪ During a disruption situation, a well-designed set of C&C procedures covering operational (Bronze), tactical (Silver) and strategic (Gold) levels is required.
	▪ Ensure staff working within C&C structures are appropriately trained and qualified and that commanders at each level (bronze, silver and gold) have appropriate levels of delegated authority and empowerment to enable decisions to taken by the people in the best position to make them.
	▪ Provide dedicated facilities and regularly tested equipment.
	▪ Ensure sufficient administrative support personnel is available.
	Staff and facilities
	▪ Gold, Silver, and Bronze Commander positions should be role, rather than rank specific.
	▪ Roster qualified staff in such a way that a suitable person is always available (and more people can be brought in quickly if

Principle	Recommended practices
	a situation escalates), and support staff need to be available at very short notice to provide administrative and technical support. ▪ For each C&C level, provide suitable facilities and regularly tested equipment for monitoring key parts of the airport and for communicating with key members of staff and other airport stakeholders.
Communicate with passengers	▪ Develop a dedicated passenger communications plan for times of disruption that meets the following criteria: prominent information on the airport's website; uses everyday language; utilises appropriate channels (for instance social media) to reach passengers; provides consistency of information across key channels; and ensures staff have access to at least the same information as passengers with a smartphone. ▪ Consider whether airports are better placed than airlines to provide information to passengers about their rights, which can help ensure passengers get what they need (and are entitled to) during disruption.
Practice	**Table top exercises** ▪ Test disruption planning through table top exercises as frequently as practicable. ▪ Develop a coherent programme of table top exercises to ensure that all major contingencies are tested with a reasonable frequency. These exercises should involve Board level participation to ensure that the appropriate focus is brought to bear and to ensure that any lessons emerging are likely to be taken into account. ▪ Agree the programme of table top exercises with the main airport stakeholders in advance, to ensure that all parties have at least the opportunity to comment on the suitability of the programme. Ideally, stakeholders should also have the opportunity to contribute to the design of individual exercises as well as taking part in the exercises themselves. ▪ Exercises should be documented both during and afterwards. **Major practice exercises** ▪ Undertake major practice events. ▪ Agree the programme of practice exercises with the main airport stakeholders in advance, to ensure that all parties have at least the opportunity to comment on the suitability of the programme. Ideally, stakeholders should also have the

Principle	Recommended practices
	opportunity to contribute to the design of individual exercises as well as taking part in the exercises themselves.
	▪ Exercises should be documented both during and afterwards.
Learn lessons	▪ Ensure that suitable 'wash-up sessions' are held after each disruption incident and each practice exercise. Following good practice these wash-up sessions should involve all relevant stakeholders.
	▪ Consider how cultural practices can be fostered that encourage openness about mistakes and help to ensure that these can be reduced in future.
	▪ Learn lessons from non-aviation related incidents as well as aviation-related disruptive events. 'Isomorphic learning' can be facilitated through effective corporate intelligence networks and participation in cross-industry and cross-sectoral initiatives designed to share experience and best practices.
	▪ Consider how lessons can be learned from consumers' own experiences of disruption by engaging directly with them.

Chapter 4
Collaborate

4.1   The various organisations at airports run operations that interact closely, but which are, in many ways, fundamentally different from each other. For example: handling agents and the UK Border Force operate a relatively small range of services; airlines operate networks across the world; while airports themselves need to manage the facilities for a very disparate range of operations, as well as handling passengers, staff and other visitors.

4.2   These different organisations will therefore have different approaches to handling disruption. For airlines, dealing with disruption can mean diverting flights or substituting aircraft across their whole networks, but with little interest in parts of the airport which they do not use. The airport, on the other hand, is focused on the impact on the whole airport estate but does not consider any network implications for airlines.

4.3   For this reason, it does not make sense for risk management by these very different organisations to be completely merged – they will continue to need to operate separate processes. However, there is clear value in significant interaction between the different organisations, particularly where:

- There are joint responsibilities, such as for passenger welfare;

- Problems and potential solutions for one party affect the other (such as infrastructure or aircraft technical problems);

- There are constraints on capacity which mean that not all planned flights can be accommodated;

- The preferred response to a problem differs between the organisations due to having fundamentally different business models.

4.4   Recognising these interdependencies, airports should involve their key stakeholders in the risk management process. In some cases, some airlines, handling agents or other stakeholders may not wish to participate in particular consultations, practice exercises or other activities, but the important thing is that the opportunity should be provided. This is likely to apply to:

- Identifying and assessing risk;

- Controlling/treating risk;

- Agreeing processes for ensuring passenger welfare;

- Developing, practicing and reviewing contingency plans;

- Reviewing, training for and practising command and control procedures;

- Determining which table top/ practice exercises should take place as well as participating in them.

4.5   In order to achieve this level of involvement, regular formal meetings could be established, involving key people at the right levels of each organisation.

Chapter 5
Manage risks

5.1   Large airports are in continuous operation so that many types of disruption are likely to have been experienced over a period of several years' operation. Nevertheless, it should not be assumed that all risks are understood, particularly those that have low likelihood of occurring (but whose impact may be significant), while technological and operational changes are likely to generate new risks (e.g. relating to IT problems).

5.2   Regular risk identification exercises are necessary given the changes to airport's activities and context, including 'rising tide' events such as unpredictable weather and pandemics. Evidence from other major strategic industries suggests that annual reviews are the norm.

5.3   Following the Collaborate principle (above), risk identification exercises should involve all other major stakeholders at an airport, including the emergency services, principal airlines, handling agents, utilities, fuel suppliers and UK Border Force. This requires the airport to lead the exercise, and solicit inputs from other stakeholders as appropriate whilst managing any confidentiality issues (certain identified risks are likely to be sensitive from a security point of view). The airport would then remain responsible for the outputs of the process.

5.4   Most, if not all, airports already use the 5x5 risk assessment approach (see Figure 2 for an example from the National Risk Register) and this feeds into a capital investment programme, which is the main method that airports use for controlling risk. This is a sensible approach and is used in all of the industries reviewed in the SDG study.

Figure 2: Example 5x5 risk matrices from the National Risk Register

Relative plausibility of occurring in the next five years
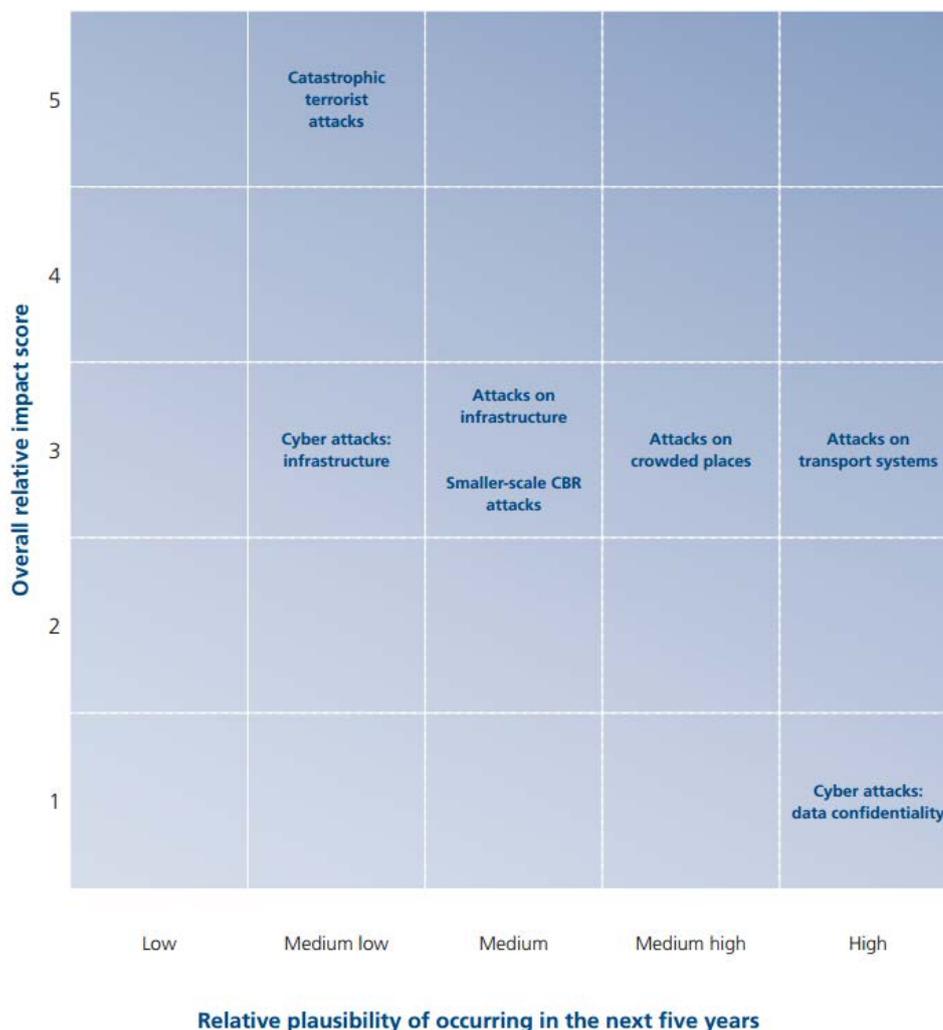
Capital investment

5.5 Capital investment can either be in relation to capital expenditure (capex) on maintenance, which should ensure that assets remain serviceable and safe (to avoid introducing new risks through equipment failure), or through investment in new facilities to reduce existing risks. An example of the former would be maintaining the runway and taxiway pavement to reduce the risk of accidents or damage to aircraft. An example of the latter would be enhancing the capacity of the airport fuel farm to reduce the likelihood of fuel shortages in the event of supply shortages.

5.6 Airports should consider how widely they need to consult on their capital programmes, as consulting with stakeholders other than major airlines may provide different perspectives on their investment proposals. An example could be consulting handling agents in relation to capex to address risks associated with airport facilities.

Operational procedures

5.7   In addition to capital investment, airports should consider how risks can be controlled through operational procedures. For example, where crowds build up in a terminal, staff may be proactively deployed to ensure that risks are managed – e.g. at the top of escalators or around tracked transit systems etc. Another example would be a well thought out sweeping plan for runways to avoid foreign object damage to aircraft.

5.8   In certain situations, the command and control structure may be 'stood up' proactively, i.e. in advance of a disruption situation arising, most likely at the bronze level. This could be appropriate on days which are expected to be busier than normal (e.g. due to public holidays, sporting events, etc.), even if the operation is proceeding normally.

Chapter 6
Plan and deploy contingencies

6.1   Not all of the risks that could lead to disruption will be manageable through capex or operational procedures. Effective business continuity management also requires that the airport management and other stakeholders develop suitable contingency plans to mitigate the consequences of disruptive events if they do materialise and ensure that normal operations can be restored and sustained. These plans should be based on a combination of long-term experience as well as the risk assessment process described above.

6.2   Contingency plans should function both as pre-existing documents and as a set of processes for managing events on the day. We discuss the plan documentation in this subsection, while the associated processes to make them effective are considered below.

6.3   Good practice in other industries suggests that it is appropriate to have an overarching plan for an airport or a major facility of the airport that includes the general principles to be followed when an event occurs. This would be applicable for any consequence and would include, for example the Command and Control procedures.

6.4   Underneath this overarching plan there are likely to be further contingency plans, whose detail will vary depending on the event which they cover. As many different disruptive events - including true 'life and limb' emergencies, and problems such as severe weather and infrastructure failure - are likely to lead to similar consequences, the plans should be focused on managing these consequences or outcomes, rather than on the event that causes them. Thus aircraft accidents, weather disruption or infrastructure failure could all lead to cancellations and passenger overcrowding. Therefore, contingency plans are required to deal with major sets of consequences such as:

- Runway closure;

- Welfare issues faced by passengers whose flights have been delayed or cancelled;

- Failure to return luggage to significant numbers of passengers;

- Loss of flight information;

- Loss of terminal power or water supplies;

- Terminal evacuation;

- Overcrowding.

6.5   A number of principles can be set out in relation to the content of these contingency plans. In particular, they should add value during a disruption situation, through providing relevant information on:

- Who should be involved in managing the situation, with contact details;

- What checks should be undertaken to understand the problem;

- Options for handling the situation (if more than one is available);

- Key information relevant to any selected option (for instance area for relocating passengers, procedures for coordinating information given to passengers);

- Rules for interaction with the Command and Control organisation and with other stakeholders;

- Recovery processes for moving back towards normal operations.

6.6   Airports should therefore judge their contingency plans on whether:

- There is an overarching plan which covers the general principles and approach to managing disruptive events;

- This overarching plan is underpinned by a set of plans covering all major 'consequences' of disruption events, based on the risk assessment process and general experience;

- The content of the plans provides necessary information for their recipients;

- The plans are available to all those needing access either to follow the approach set out or to understand what others will be doing;

- The plans are set out clearly and are easy to use in stressful situations;

- The plans are capable of being applied to sustained periods of disruption (e.g. volcanic ash events which could last several weeks), as well as shorter-term events (e.g. high winds, industrial action).

6.7   As well as considering the strengths and weaknesses of the plans themselves as they exist at any one time, the processes for developing the plans, including the link to the risk assessment, the involvement of all relevant stakeholders and processes for monitoring, review and improvement should all be considered.

6.8   Plans that impact significantly on other stakeholders should be shared with those organisations for information and comment. Plans should be reviewed, alongside stakeholders, regularly.

Command and control arrangements

6.9 During a disruption situation, a well-designed set of command and control (C&C) procedures covering operational, tactical and strategic levels is required. The typical approach used by the emergency services and other public sector organisations is the integrated emergency management (IEM) C&C structure, a hierarchy of Gold, Silver and Bronze levels (see Table 3):

- Gold Command – the strategic level

- Silver Command – the tactical level

- Bronze Command – the operational level.

6.10 A good description of the generic approach is set out in the 2009 National Police Improvement Agency Guidance on Command and Control.[5]

Table 3: Integrated emergency management explained

Level	Function and objectives
Bronze - operational	Deals with situations beyond 'business as usual'. The Bronze response is typically implemented through one or more 'response teams', depending on the situation. For example, at airports with more than one terminal there may be different IRTs in each one. Bronze Command centres can be established either centrally to cover the whole airport, or locally within each terminal, but in either case, appropriate communication protocols must be observed. The Bronze Commander is likely to be a duty manager, or equivalent role, in the relevant part of airport.
Silver - tactical	Typically provides an overview of the whole airport and is invoked in the context of a major disruption (such as significant snowfall). Each airport would typically have only a single Silver Command operation, whose role is to coordinate the response across the whole airport, giving direction to the operational Bronze Command teams. Silver Command needs to have the capability to monitor all activities on the airport and to communicate with all relevant airport staff and with other stakeholders, including airlines, handlers, emergency services and UK Border Force. The Silver Commander is likely to be a senior member of the airport management team with delegated authority to take significant decisions which may have financial implications.
Gold - strategic	Invoked in situations whose consequences are very severe. May extend beyond the airport boundary or endure over a long period (e.g. more than a single day). The function of Gold Command is less to direct the management of the incident than to manage the interfaces with other

5   http://www.acpo.police.uk/documents/crime/2009/200907CRICCG01.pdf

Level	Function and objectives
	involved parties (e.g. emergency services, government, news organisations) and to take strategic decisions with major consequences for a large number of people and organisations. The Gold Commander is likely to be a member of top airport management with delegated CEO authority.

6.11   In some situations it may be appropriate to stand up the Command and Control structure proactively, i.e. in advance of any disruption situation developing (due to, for example, expected heavy passenger flows or locally relevant severe weather forecast or flood warnings).

6.12   Key requirements to make the Command and Control structure work are:

- Appropriately trained and qualified staff available to take the Bronze, Silver and Gold Commander roles;

- Delegated authority to the commander roles to enable decisions taken by those in best position to make them;

- Dedicated facilities and equipment to support the Bronze, Silver and Gold Command operations;

- Communications equipment of suitable quality; and

- Dedicated administrative support personnel available.

Staff training and qualification

6.13   The Gold, Silver, and Bronze Commander positions ought to be role, rather than rank specific. It should not be assumed that because a person is sufficiently senior they should automatically take the role of Gold, Silver or Bronze Commander. Instead, staff of the appropriate rank need to be trained, tested and then practice the role, before assuming the function in a live situation.

Staff availability

6.14   Disruptive events can happen at any time, so it is imperative that suitably trained and qualified staff are available to undertake the required role(s). Therefore, qualified staff need to be rostered in such a way that a suitable person is always available, and there should be robust procedures in place to ensure that further people can be called in at short notice should a situation escalate.

6.15   In addition, support staff should be available at very short notice to:

- Provide administrative support – contacting key staff and other stakeholders, taking minutes and disseminating decisions taken, acting as a point of contact; and

- Provide technical support to communications and IT systems.

Facilities and equipment

6.16   Each level of command should have suitable facilities for monitoring key parts of the airport and for communicating with key members of staff and other airport stakeholders. Where appropriate facilities should be available for other stakeholders to participate in meetings and to communicate directly with their own organisations.

6.17   The need for measures, such as back-up communications and other equipment, should be considered to deal with potential loss of capabilities such as mobile phone networks and internet access.

6.18   There should be a rigorous process to fully test the capabilities of the facilities and equipment regularly.

Chapter 7
Communicate with passengers

7.1   Good communication with passengers is critical to reducing the impact of disruption on them and ensuring they get the outcomes they need. The 2014 Transport Resilience Review stresses that passengers views of how well disruption is handled by transport operators is determined principally by the information they receive. Passengers who have confidence in the information they are being given are more likely to act on advice, potentially helping to relieve rather than exacerbate the situation.

7.2   The Review also acknowledges the challenges to good communication, particularly as consumers' information expectations continue to rise, driven by 24-hour news availability, development and penetration of mobile technology, and the ubiquity of internet information and social media.

7.3   However, with 61% of UK adults now owning a smartphone (up from 29% in 2012)[6], transport operators have greater opportunities to get information to passengers around the clock - in order to exploit these opportunities airports need to ensure the information they provide is timely, credible and useful ,and delivered through the main channels that passengers use.

7.4   Broadly, in the context of disruption at airports, and reflecting the hierarchy of passenger needs in such situations, communication with passengers covers the provision of information in the four key areas set out below. In the first two there are clear roles - or potential roles - for airports.

- Flight status;

- Rights to care and assistance;

- Helping passengers rearrange flights and change onward travel arrangements;

- How to make a complaint and obtain redress;

---

6   http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr14/UK_5.pdf (Table 5.81, p365)

Information about flight status

7.5   We recognise that airports are often dependent on airlines for flight status information. It would be unreasonable to expect airports to help passengers rebook flights and change onward travel arrangements (although they could facilitate this by providing the means – e.g. free or low-cost Wi-Fi, public telephones – for passengers to 'self serve').

7.6   Nonetheless, it should be possible for airports to develop a dedicated passenger communications plan for times of disruption that meets the main recommendations set out in the 2014 Transport Resilience Review and the Transport Select Committee report. We have also included relevant recommendations from a recent Passenger Focus report on information provision during rail disruption:[7]

- Give prominence on airport websites to the latest service information during periods of disruption, ensuring that it is the first thing passengers can access and that vital information does not blend in with the rest of the website;

- Use everyday language, not technical jargon, and accurately describe the cause(s) of disruption and what is being done to restore services;

- Understand which channels (e.g. social media) passengers refer to and use them appropriately;

- 'Sense check' if online information provided by key third parties (e.g. airlines; major news websites, such as the BBC and local media; prominent social media accounts) is accurate, consistent and up-to-date;

- Ensure staff have access to at least the same information as passengers with a smartphone, by issuing them with appropriate equipment.

7.7   It may not always be possible for the airline or airport to immediately provide detailed information on flight status. In situations where little information is available, airlines and airports are encouraged to provide what information they have and commit to communicating more information as and when it becomes available. Openness and honesty in communication is important in building confidence from passengers and users.

---

7   http://www.passengerfocus.org.uk/research/publications/passenger-information-when-trains-are-disrupted

Information about rights to care and assistance

7.8   Even though they are not legally responsible, airports should nonetheless consider whether they are better placed than airlines to provide information to passengers about their rights. 'Passive' approaches, such as posters and/or leaflets in prominent landside and airside departure and arrival locations, and giving prominence to this information on airport websites during disruption, may be more appropriate than actively intervening in situations.

7.9   Unless robust arrangements can be negotiated with airlines, the passive provision of information represents a relatively straightforward way for airports to help ensure passengers' needs are met while avoiding the confused responses that can emerge where airports provide assistance to passengers which they deem to be appropriate and subsequently face problems claiming compensation from airlines on the basis that the latter have the legal duty of care.

Chapter 8
Practice

8.1   It is generally accepted that, in order to be useful in practice, contingency plans need to be regularly tested. This testing can either be through scenario planning 'table top' exercises, or on-the-ground practical exercises, both of which are discussed below.

Table top exercises

8.2   Table top exercises have the advantage of using far less resource than full scale practices and therefore are a valuable tool which should be used as frequently as practicable without using excessive resource.

8.3   Given the wide variety of different scenarios for disruption, it is sensible to develop a coherent programme of table top exercises to ensure that all major contingencies are tested with a reasonable frequency. These exercises should involve Board level participation to ensure that the appropriate focus is brought to bear and to ensure that any lessons emerging are likely to be taken into account. Exercises should cover both 'true emergencies' such as aircraft accidents as well as other disruptive events such as severe weather, loss of infrastructure or failure of surface access.

8.4   Following the Collaborate principle, the programme of table top exercises should be agreed with the main stakeholders (airlines, handling agents, emergency services) in advance, to ensure that all parties have at least the opportunity to comment on the suitability of the programme. Relevant stakeholders should also be given the opportunity to contribute to the design of individual exercises as well as taking part in the exercises themselves.

8.5   In line with the Learn lessons principle (next section), the exercises should be documented both during and afterwards.

Practice Exercises

8.6   Despite the value of table top exercises, they are not a substitute for practical exercises to test contingency plans. Airports are obliged under CAP 168 to undertake a full-scale practice of handling an emergency situation (such as an aircraft accident) at least every two years, in order to maintain their aerodrome licence. There is, however, no legal obligation to undertake practices for other disruption events.

8.7 Despite this lack of legal obligation, airports following good practice should undertake major practice events.

8.8 As with table-top exercises, the programme of practice events should be agreed with the airport's main stakeholders (airlines, handling agents, emergency services) in advance, to ensure that all parties have the opportunity to comment on the suitability of the programme. Relevant stakeholders should also be given the opportunity to contribute to the design of individual exercises as well as taking part in the exercises themselves.

8.9 As with the table top exercises, practice events should be documented both during and afterwards. A formal 'wash-up' session taking place involving all major participants can help this process. It may also be helpful for a neutral facilitator to collect the information about the event and establish the conclusions to be drawn.

Chapter 9
Learn lessons

9.1   No risk or contingency management process will be flawless, so it is essential that suitable 'wash-up sessions' be held after each disruption incident and each practice exercise. Following good practice these wash-up sessions should involve all relevant stakeholders (with stakeholders having the choice to determine whether they consider themselves relevant in each individual case). Including front-line staff as well as senior personnel will help ensure that the full breadth of experiences - i.e. what went well and what did not go well - is captured.

9.2   It may be helpful for neutral, qualified moderators to facilitate wash-up sessions, so that an independent view of the successes and failures is established. It would also provide the opportunity for confidential feedback to be provided, which might elicit more, and potentially valuable, information than in an open forum.

9.3   In safety critical occupations, various cultural practices are adopted to reduce long term risk, in particular by encouraging openness about failures to avoid their repetition. For instance those working in aviation have access both to confidential reporting to the CAA, and to CHIRP, the UK's independent confidential reporting programme for aviation and maritime. Many businesses also adopt a 'no blame culture', where staff are guaranteed not to be penalised for mistakes, on condition that they are reported. The concept of a 'just culture' is similar, encouraging people to report mistakes, although gross negligence may well be penalised.[8]

9.4   Airports should consider how they can foster cultural practices that encourage openness about mistakes and help to ensure that these can be reduced in future. Examples of these practices include formally adopting a 'just culture', providing facilities for confidential reporting, or running regular (annual) confidential staff surveys which would incorporate questions on managing risk and disruption.

---

8   Further information about creating an effective reporting culture can be found in the CAA's Guide to Ground Safety Reporting, CAP382S:
    http://www.caa.co.uk/docs/33/CAP%20382S%20Ground%20safety%20reporting%20guide%20web.pdf

9.5   There is also a need to take every opportunity to learn from others' bad experiences and misfortunes or, indeed, what went right. Incidents and events affecting airports and other industries worldwide are important sources of 'isomorphic learning' (the facility to learn from the experiences of others) and corporate intelligence, networking and relationships with government agencies should be geared towards this. Examples of such events include the Asiana Boeing 777 crash at San Francisco Airport; the sinking of the Costa Concordia; the Santiago de Compostela derailment.

9.6   Finally, airports and their stakeholders should also consider how they can learn lessons from consumers' own experiences of disruption. This may include encouraging consumers to complain and give feedback, sharing complaints data among stakeholders, and monitoring social media as a way of understanding consumer sentiment. One approach for consideration would be the introduction of ongoing quantitative research to measure improvement in passenger satisfaction with the handling of disruption, particularly the impact of new measures and approaches.