Operational resilience:
Principles, policies and procedures

Gatwick Airport Ltd

Publication version

October 2014
## Contents

1) Introduction........................................................................................................................................... 3  
2) Regulatory context for this operational resilience document ................................................................. 6  
3) Risk management process......................................................................................................................... 11  
4) Gatwick’s stable operations initiative ...................................................................................................... 16  
5) Asset stewardship................................................................................................................................... 19  
6) Incident command and control process ..................................................................................................... 24  
7) Exercises, lessons learned and evaluation ................................................................................................ 32  
8) Overview of specific contingency plans.................................................................................................. 34  
9) Stakeholder engagement and way forward ............................................................................................... 42  

Appendix 1) Compliance with regulatory guidance....................................................................................... 45  
Appendix 2) Operational resilience monitoring report – proposed format ..................................................... 48
1) Introduction

Introduction

Gatwick Airport is the world’s busiest single runway airport. Gatwick occupies a key strategic location in the Greater London area, one of the busiest centres for air transport in the world. The airport is the UK’s second busiest by passenger traffic, the tenth largest in Europe for international passengers, and handles approximately 25% of Greater London’s traffic. In 2013, 35.4 million passengers passed through Gatwick. Gatwick Airport serves over 215 destinations worldwide with a diversified route network and a broad base of airlines – over 60 carriers operate regularly from the airport.

Within this context of a busy operation, maintaining operational resilience is important to Gatwick, as well as to our airline and passenger customers, and other partners at the airport. The Cabinet Office in 2011 defined resilience as “the ability of assets, networks and systems to anticipate, absorb, adapt to and/or recover from a disruptive event.”

Gatwick recognises that incidents can, and do, happen, and it will not always be possible to continue normal operations under all conditions; however, our approach to operational resilience is about equipping the airport to:

- Focus on reducing the probability that unforeseen events adversely impact on our operations, users and passengers;
- Have processes in place to both reduce the probability that failure of our facilities impacts on our users and to ensure that faults are remedied in a prompt manner; and
- Have contingency plans in place to enable us to react appropriately when events impact on our facilities and to ensure that passengers receive the best outcome possible, given the circumstances, and to enable us to recover from incidents as quickly as possible.

This section introduces Gatwick’s approach to resilience planning, as well as setting out the content of this document.

Gatwick’s approach to operational resilience

Our approach to resilience planning covers a broad range of issues, but there are a number of components at its centre:

- Our risk management process;
- Our Stable Operations initiative;
- Our asset stewardship process;
- Our incident command and control process;
- Our exercises, lessons learnt and evaluation regime;
- Specific contingency plans, processes and procedures, both for specific events or symptoms (such as passenger welfare, capacity reduction, adverse weather) of failure of specific assets;

---

1 Cabinet Office 2011, Natural hazards and Infrastructure.
A wide range of standard operating procedures, dealing with day-to-day events facing the airport; and
- Stakeholder engagement.

Gatwick is refreshing its core contingency plans and has been engaged with key stakeholders in a process that began in early 2014 and will conclude by the end of the financial year. This consultation has taken the form of bilateral meetings with airlines, as well as multilateral meetings with other parties including the local Airline Operators Committee (“AOC”) Executive and Passenger Advisory Group (“PAG”), where appropriate, depending on the issue. This consultation forms the basis for Gatwick’s preparedness for the Winter 2014/15 season, as well as compliance with regulatory guidance.

This document provides an overview of the Gatwick resilience arrangements, including its processes and contingency plans, with a particular focus on the principles and processes for how parties collaborate across the airport in times of disruption. This report does not seek to replicate the information set out in specific operational/contingency plans, and the specific plans and procedures are subject to ongoing individual consultations with our users.

A draft of this document was consulted with our key stakeholders during September 2014. We also held a meeting with stakeholders on 22 September 2014, to discuss operational resilience issues. Comments received through these consultation processes will be considered as part of our ongoing resilience process. We also intend to hold a further meeting in the New Year, to enable us to learn from the winter season and where possible, implement changes ahead of the summer season.

Plan of this document
This document describes the regulatory context and guidance being fulfilled by Gatwick’s procedures and contingency plans in Chapter 2. Chapters 3, 4 and 5 outline Gatwick’s risk management procedures, our Stable Operations initiative, and asset stewardship process, which are designed to help the airport to prevent and minimise the impact of disruption. Chapter 6 details the command and control process that Gatwick employs with key stakeholders, during times of disruption; while Chapter 7 outlines our exercise process, in which we practice these procedures ahead of disruption. Chapter 8 provides a summary of our key contingency plans. This chapter also contains our statement of winter preparedness. Chapter 9 describes next steps and stakeholder engagement. Appendix 1 provides a table that maps Gatwick’s fulfilment of regulatory guidance. The CAA has asked that we monitor our resilience performance and report on an annual basis. Appendix 2 provides our proposed form of reporting, which could be used in October 2015.

Further detail on Gatwick’s consultation process is provided in Chapter 8.
Consultation
Gatwick invited key stakeholders to offer comments against this document for consultation, specifically against the following two questions:

1)  *Do you consider that Gatwick’s approach to operational resilience, as well as contingency planning is appropriate?*

2)  *Is there any area not outlined by this report you believe that we should consider?*

The consultation closed on 24 September 2014. We received responses from the ACC, British Airways, the CAA, easyJet, GATCOM, NATS, NERL and the PAG. We would like to thank stakeholders for responding and for the constructive and collaborative approach taken. While this document provides a “snapshot” when it is published on 1 October, we recognise the need for continuous improvement and further consultation. We are intending to adopt a ‘resilience cycle’ approach, whereby we focus our attention on resilience issues to appropriate times of the year. In chapter 9 of this document we outline how we propose to take this work forward.
2) Regulatory context for this operational resilience document

Introduction
As well as ensuring that Gatwick is prepared for the Winter 2014/15 season, we have committed ourselves to fulfil a number of regulatory guidance concerning operational resilience. This requirement is described below, in the following categories:

- Gatwick’s Commitments;
- McMillan report on disruption at Gatwick during Christmas Eve 2013;
- CAA’s guidance on operational resilience (February 2014); and
- CAA’s additional guidance and SDG review (draft guidance received July 2014; while the final guidance was received on 23 September 2014).

This document and the process of consultation undertaken during 2014/15 fulfils these requirements. Appendix 1 details Gatwick’s compliance with regulatory guidance.

Gatwick’s Commitments
In April 2014, Gatwick Airport put in place a set of legally binding Commitments to our airline customers that established price and service quality levels for the proceeding seven years. These are set out in our Conditions of Use. Among our commitments, we have undertaken to:

- Consult annually on operational resilience with all interested parties, including the Civil Aviation Authority (“CAA”);
- Publish one or more plans (or other documents) setting out the principles, policies and processes;
- Have regard to any relevant guidance issued by the CAA, in drafting and amending plans;
- Consult all relevant parties on those plans or documents in a fair and timely manner providing consultees with an adequate level of information, prior to publishing any plans or other documents;
- Hold a meeting with all relevant parties or organisations representing them, to discuss any issues pertinent to this operational resilience commitment, at least twice a year.

In addition to this document, Gatwick has been consulting with our airline community and our Passenger Advisory Group on a series of individual plans and policies.

We held a meeting on 22 September 2014, to discuss operational resilience issues. We also intend to hold a further meeting in the New Year, to enable us to learn from the winter season and where possible, implement changes ahead of the summer season.

---

3 Set out in Conditions of Use 7.2-7.5.
McMillan report on disruption at Gatwick during Christmas Eve 2013

Gatwick’s operations were severely affected by the adverse weather late on 23 December 2013 and early on Christmas Eve. Following the disruption, the Board of Gatwick Airport Limited appointed David McMillan, a Non-Executive Director, to lead an urgent review of the events. The key points that the review covered were:

- The adequacy of the airport’s flood prevention and alleviation plans, including the extent to which the relevant recommendations have been implemented, from the report written by Sir Michael Pitt following the 2007 flood;
- The adequacy of the airport’s contingency and resilience plans for dealing with these events on airport operations;
- The execution of all of these plans in the period of the incident; and
- The process of recovery from the incident.

The McMillan report made 27 recommendations to the Gatwick Board. We fully accepted all recommendations and have set aside up to £30 million to help to implement the recommendations.

As a result of the experiences of December 2013, we have launched our Stable Operations initiative, as set out in Chapter 4. As mentioned above, we are also refreshing our contingency plans, along with consultation on individual contingency plans.

CAA’s guidance on operational resilience (February 2014)

The CAA issued guidance on operational resilience in its February 2014 licence decision. In its guidance, the CAA noted that operational resilience at airports needed strong, centralised leadership to co-ordinate planning for and to response to disruption. Further, the CAA noted that this role was best suited to the airport operator, given its direct links to parties and service operators at the airport. For the airport operator to be able to take such responsibility, it would need to be able to set out reasonable expectations on what it would require from parties to ensure an effective response from the whole industry, and as far as possible, these expectations should be developed jointly and agreed on a voluntary basis.

In its guidance, the CAA set out its expectation that:

- Gatwick should have risk assessments for the infrastructure under its control and for all the services it offers at the airport;
- Clear management processes and clear communication plans should be in place for remedying and dealing with the impacts of the loss of that infrastructure or service;
- Processes and plans for the dissemination of information to passengers;
• Provision of a ‘backstop’ level of passenger welfare, where the airlines are slow or unable to do so;

• Plans for dealing with the effect of disruption of services not operated by Gatwick (such as fuel supply, groundhandling services, or air traffic control) on Gatwick’s own operations;

• Contingency plans for the loss, for whatever reason, of:
  o Access to key infrastructure at the airport (such as the terminals, runway or airfield);
  o IT systems;
  o Key suppliers; and/or
  o Key staff (including UK Border Force (UKBF)); and

• For resilience plans to work effectively, they must be underpinned by solid day-to-day working relations, possibly through development of formal business continuity models, and the CAA would expect Gatwick to maintain clear working arrangements with relevant parties.

CAA’s draft additional guidance and SDG review (draft guidance July 2014; final guidance 23 September 2014)
In addition to the guidance it issued in February 2014, the CAA also consulted on additional guidance on 9 July 2014, which was finalised on 23 September 2014. The CAA also arranged for a review of resilience arrangements at Heathrow and Gatwick to be undertaken by Steer Davies Gleave (“SDG”). The SDG review made the following recommendations:

• Establish formal processes to discuss risks and how they might be avoided or mitigated with other stakeholders. The airports’ obligations would be deemed to be fulfilled through providing the opportunity for engagement;

• Formal training, practices and testing of Commanders;

• Levels of delegated authority for Commanders to be made appropriate;

• Increasing the involvement and collaboration between airport stakeholders in the specification of exercises undertaken;

• Development of an overarching contingency plan document that includes all the principles to be followed when a disruptive event occurs;

• Development of a smaller number of plans, each covering a wider range of situations and containing more information, including contact details for key personnel;

• The airports should establish, or more strongly promote existing internal systems to allow confidential reporting and establish a no-blame or “just culture”; and
Joint Business Continuity Planning Cooperation should be formalised throughout the operational resilience management process.

Based on the recommendations of the SDG report the CAA issued a consultation on additional guidance on 9 July 2014. This draft guidance sets out additional details on risk management, passenger welfare, learning lessons, joint business continuity planning and processes for reducing demand during times of disruption. CAA issued its final guidance on 23 September 2014, as shown in the table below.

Table: CAA’s additional guidance (draft July 2014; with blue text additions reflecting final guidance received on 23 September 2014)

<table>
<thead>
<tr>
<th>Summary of CAA Guidance*</th>
<th>Passenger Welfare</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk management</strong></td>
<td></td>
</tr>
<tr>
<td>• Provide an overarching contingency plan document and seek agreement from all relevant airport stakeholders</td>
<td>• Gatwick should be clear in its plans that, if it considers it necessary during a disruptive event, it will be prepared to step in to offer a backstop level of welfare assistance and information and may recover its reasonable cost. Details on the type so assistance that might be provided should be made clear in its plans and may be agreed with airlines individually or though the AOC in advance. Seek agreement with the airline community on procedures for handling information dissemination and providing backstop support.</td>
</tr>
<tr>
<td>• Establish clear rules for when the different command levels should be triggered</td>
<td></td>
</tr>
<tr>
<td>• Provide a formal training, practice and testing regime from Bronze, Silver and Gold commander and deputies. <em>(regime to be approved by the CAA)</em></td>
<td></td>
</tr>
<tr>
<td>• Establish clear levels of authority for each commander, including spending and capability to make decisions.</td>
<td></td>
</tr>
<tr>
<td>• Ensure that the involvement of key stakeholders, such as airlines, forms an integral part of the Command and Control processes and there is live sharing of operational information between stakeholders</td>
<td></td>
</tr>
<tr>
<td>• Ensure facilities used by Command and Control are tested annually</td>
<td></td>
</tr>
<tr>
<td>• Develop engaging with stakeholders to discuss and if possible agree a programme of tabletop and practical exercises to test contingency plans, which should be undertaken so as to cover all major types of contingency every two years.</td>
<td></td>
</tr>
<tr>
<td>• Decide in accordance with risk assessment processes, the nature and number of exercises of each type necessary to ensure it fulfils its licence obligations to secure the availability and continuity of airport operation services.</td>
<td></td>
</tr>
<tr>
<td>• At least 3 tabletop exercises per year are recommended and at least one practical exercise relating to a non-emergency disruption situation every other year.</td>
<td></td>
</tr>
<tr>
<td>• Where stakeholder coordination, passenger management, information and welfare responses are tested as part of the mandatory emergency exercise which each airport is required to undertake every other year under CAP168, such exercises can be considered to contribute to fulfilling the operational resilience condition.</td>
<td></td>
</tr>
<tr>
<td>• Live events will also be considered to contribute to the</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Passenger Welfare</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Understand airlines preparedness to meet their obligations under EU261 with regard to passenger welfare. Make sure it fully indemnifies airlines for where it has to make backstop provision and consider whether a penalty for such an outcome should be levied be clear about how it will recover its costs.</td>
</tr>
<tr>
<td>• Develop an understanding of what capabilities its airlines have to communicate with their passengers, including understanding airlines preparedness to deliver their obligations under EU 261. Use this to inform its own planning about the likelihood that it may have to step in to offer backstop provision of welfare or information.</td>
</tr>
<tr>
<td>• Subject to confidentiality share best practice among airlines regarding passenger welfare and information response.</td>
</tr>
</tbody>
</table>

* The CAA’s draft guidance can be viewed in full on: [www.caa.co.uk/docs/5/Gatwick%20-%20consultation%20on%20additional%20guidance%20under%20operational%20resilience%20conditions.pdf](http://www.caa.co.uk/docs/5/Gatwick%20-%20consultation%20on%20additional%20guidance%20under%20operational%20resilience%20conditions.pdf)  
Revisions for the final version are highlighted in blue.
fulfilling of the operational resilience condition, provided that full post-incident reviews have been carried out.

- As far as possible the planning and exercising of the programme should be done in collaboration with relevant stakeholders. Where stakeholders are unable or unwilling to engage or agree, any identified limitations on Gatwick’s ability to carry out full and effective exercises will be taken into account in any future related regulatory action.
- Ensure that wash-up sessions are undertaken for all exercises, inviting representatives from relevant organisations to participate.

<table>
<thead>
<tr>
<th>Learning lessons</th>
<th>Joint Business continuity planning</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Gatwick should carry out reviews of disruption incidents and of practices held jointly with other stakeholders. Where the CAA reasonably requests it, reviews of disruption incidents should be led by an independent reviewer and, in any case, reviews should include:</td>
<td>• Establish a formal process involving all key stakeholders to consider all parts of the Business Continuity Planning process, from risk identification and assessment through management of incidents on the day, training and exercising schedule for the next year to the lesson learning process. Including</td>
</tr>
<tr>
<td>o Details of cause of incident or exercise and response</td>
<td>o At least on senior level meeting annually</td>
</tr>
<tr>
<td>o Degree of stakeholder engagement and participation and compliance with processes</td>
<td>o Supporting meetings at the work level at least quarterly</td>
</tr>
<tr>
<td>o An assessment of the effectiveness of current plans and processes</td>
<td>• These meetings should be specifically focused on joint business continuity planning, but may use existing forms</td>
</tr>
<tr>
<td>o The effectiveness of welfare and information provision to passengers</td>
<td>• Opportunities to participate should be offered to airlines, ground handling agents, ANSPs other airport infrastructure operators (fuel farm), emergency services, UKBF and local authorities and other members of Local Resilience Forum</td>
</tr>
<tr>
<td>• Demonstrate that it has instituted internal procedures to encourage the reporting of honest mistakes by staff and attempt to agree procedures for open discussion with other stakeholders.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Processes for reducing demand</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Agree with airlines processes and protocols for agreeing reductions in demand during times of reduced capacity at the airport. Facilitate the process</td>
</tr>
</tbody>
</table>
3) Risk management process

Introduction
The risk management framework embedded within Gatwick is designed to minimise the frequency
and impact of undesired and unexpected events on Company objectives and to enable Gatwick to
optimise its business opportunities.

This section summarises:
- Gatwick’s approach to risk;
- Gatwick’s risk management framework; and
- The principal operational risks for review by the audit committee.

Gatwick’s approach to risk
Gatwick has a joined-up approach to risk and business continuity. Both of these imperatives form part
of the incident prevention and management strategy, as well as informing mitigations. In recognition
of Gatwick’s capability in this area, we were accredited with PAS55\(^5\) status, in which the processes
outlined below are assessed.

Risk is managed at Business Unit (“BU”) level. Each BU is responsible for managing its risks and to this
end, each produces a risk register, which details relevant risks, rated against the metrics of
“likelihood” and “severity”, within a standard 5 x 5 grid, as shown in the figure below.

Figure: Risk assessment 5x5 grid

---

\(^5\) PAS 55 is the British Standards Institute Publicly Available Specification number 55 for the optimised management of physical
assets. It provides a clear, internationally recognised definition of what good asset management means.
Risks are primarily assessed when identified, as an unmitigated risk in the first instance and then they are rated a second time with mitigation in place. The impact rating is measured against EHS, financial, environmental and reputational impacts with the highest most likely outcome taken as the output. The final score is defined as the control rating, which measures the adequacy of the controls and mitigation in place. The remainder of the register consists of a list of opportunities, from which a further mitigation, not currently being undertaken, can be measured in order to calculate the value of adding this further mitigation.

The registers are assessed twice a year by the Business Assurance team and the top 10 operational risks are added to the airport risk register, which must be signed off by the Gatwick Executive and referred to the Gatwick Board Audit Committee.

It is important to note that the Security risks are held on a separate register and not available to a wider audience, as certain Security clearances are required. Reviews of such risks are conducted by a group that includes the ‘blue light’ agencies and representatives from the airline community at Gatwick. In addition, the chair of the Audit Committee and Gatwick’s CEO review security risks in detail twice a year and update the Audit Committee.

As described in more detail in Chapter 6, Gatwick’s methodology for Incident and Crisis Management (“ICM”) including command and control is set out in the ‘Incident and Crisis Management (ICM) Manual’ (current version 4.5 issued August 2014). Gatwick has adopted the national Three Tier Model, as used by HM Government and national responders. This model outlines the trigger and escalation process, as well as detailed role descriptions. The document also outlines Gatwick’s approach and methodology used at times when the airport transitions from ‘business as usual’ into an ICM incident. Gatwick’s ICM manual is one of the documents that have been made available through the consultation process with airline and handling agent stakeholders. The membership of the ICM responders undertakes training with annual refresher training, which is hosted by an external supplier.

Business Continuity plans underpin the response to an incident. Gatwick has a suite of plans covering multiple events, from weather to industrial action. These are regularly reviewed and are currently open to consultation with key Gatwick stakeholders. Summaries of plans are provided in Chapter 8.

We work closely with the Local Resilience Forum (“LRF”) and sit on several relevant committees. The Resilience Group (Gatwick) is a sub-committee of the LRF (SRF in Sussex) and is co-chaired by Gatwick Sussex Police, with membership that also includes: West Sussex County Council, Crawley Borough Council, West Sussex Fire & Rescue, SECAmb, Public Health England, Sussex & Surrey Health Trust, Environment Agency, Highways Agency, Surrey Council, Surrey Fire & Rescue and Surrey police. Others are invited as the agenda requires. The group meets every six weeks at Gatwick and has a mandate to agree: i) plans, actions, risks and protocols etc.; ii) which plans will be tested in the annual simulation exercise (multi-agency); and iii) which levels of command are to be invoked. Key stakeholders are invited to participate in the exercise, as well as its planning process.
Gatwick’s risk management framework

The key elements of the risk management framework at Gatwick are (as illustrated in the figure below):

- Every Gatwick management function has an up to date, detailed risk register which is reviewed on a regular basis by functional heads, as well as risk management and business assurance, to ensure the listed inherent and residual risks remain current. Such reviews also ensure that remedial action is taken as appropriate, in order to reduce risk to its optimal level, having due regard to the associated costs and benefits. This process has been verified by the independent auditors validating Gatwick’s 14001 environmental certification, in which the Engineering and Development risk registers were reviewed and noted as being of “outstanding quality”;

- An on-going programme of validation checks is carried out by Business Assurance throughout the year, particularly on those controls being relied upon by management to mitigate risk. This is to ensure that they are in place and operating effectively. There are currently no issues outstanding;

- There is bi-annual Executive review of principal corporate risks. Within such reviews, the members of the Executive, together with Function heads, discuss risk and challenge each other’s registers, in order to:
  - Discuss, challenge and confirm the current controls in place;
  - Agree the current principal corporate risks; and
  - Agree where further action is necessary;

- As mentioned above, security risks are considered and reported outside of this process, as part of the Risk Advisory Group, given the restricted sensitivity of the information. The chair of the Audit Committee and Gatwick’s CEO review security risks in detail twice a year and update the Audit Committee; and

- The principal corporate risks are reviewed at the November and June Committees to align with the financial reporting period.
The risk registers also make the link to the Business Continuity Management process, in which contingency plans are established. While a contingency plan does not mitigate the chances of the event from occurring, it should reduce the effect that the event would have on our customers and the business. Each risk that requires a contingency plan is recognised on the functional registers and cross referenced. This process has been audited externally as part of the PAS55 accreditation, in which review there were no recommendations made for improvement.

**Business continuity management process**

As outlined above, Business Continuity Management (“BCM”) is linked to risk management. Gatwick follows the BCM lifecycle (BS25999-1), which is described as:

i. Understanding the organisation;

ii. Determining BCM Strategy,

iii. Developing and implementing the BCM response,

iv. Exercising maintaining and reviewing (plans and response),

v. Embedding BCM culture within the organisation.

Governance of the BCM function sits within the Resilience Planning Group (“RPG”), which is a multi-agency sub-committee of the Sussex Resilience Forum (“SRF”) and is chaired jointly by Gatwick Airport and Sussex Police. The membership of the RPG is set out in the table below. The RPG meets every six weeks and ensures that Gatwick, as a category 2 responder (under the Civil Contingencies Act), is aligned and embedded within the local and national response framework.
Table: Membership of RPG

<table>
<thead>
<tr>
<th>Membership of the RPG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sussex Police (Joint chair)</td>
</tr>
<tr>
<td>Business Continuity &amp; Risk Manager (Joint Chair)</td>
</tr>
<tr>
<td>West Sussex Fire &amp; Rescue Service</td>
</tr>
<tr>
<td>Surrey Fire &amp; Rescue Service</td>
</tr>
<tr>
<td>Surrey Police</td>
</tr>
<tr>
<td>SECAMB</td>
</tr>
<tr>
<td>West Sussex County Council</td>
</tr>
<tr>
<td>Surrey County Council</td>
</tr>
<tr>
<td>Highways Agency</td>
</tr>
<tr>
<td>National Air Traffic Services</td>
</tr>
<tr>
<td>Southern Railway</td>
</tr>
<tr>
<td>Gatwick Airfield Operations</td>
</tr>
<tr>
<td>Deputy Airport Fire Manager</td>
</tr>
<tr>
<td>Gatwick Terminal Management</td>
</tr>
<tr>
<td>Other agencies as applicable including AOC and UKBF</td>
</tr>
</tbody>
</table>

The main objectives of the RPG are to:

- Ensure that all of the emergency plans developed by Gatwick organisations are compliant with legislation and guidance protocols;

- To review existing plans and arrangements against the functional work streams described in the Civil Contingencies Act;

- To maintain formal communication with the Gatwick Risk Advisory Group (“RAG”) and incorporate matters arising from emergency and/or resilience items into action planning as appropriate; and

- Agrees multi-agency exercise programme.

Gatwick is also represented at other relevant SRF committees ensuring that area, countywide and local plans and responses are aligned to ensure optimum responses. The relevant Gatwick plans are held by the SRF and are available through the secure database to the relevant responding agencies (these include the Site Specific CBRNe plan, Mass Evacuation Plan and the Gatwick Access Plan, among others). This relationship ensures that airport wide plans are reviewed, prepared and signed off by all the parties that may have to respond.
4) Gatwick’s stable operations initiative

Introduction
This section outlines a major new management initiative at Gatwick – our Stable Operations initiative, which is designed to further improve existing resilience. In addition to being ready for when events do happen, operating a resilient airport also requires focus on management processes and facilities, to ensure that they remain fit for purpose and to enhance the reliability of the operation.

Stable operations
Gatwick has created a Stable Operations initiative, governed by a Stable Operations Board with the objective to ensure that Gatwick can deliver consistent, predictable and uninterrupted services, to minimise passenger disruption, flight delays, and to prevent reputational damage.

Methodology
The methodology focuses principally on delivering resilience and reliability to critical systems. The systems of principal concern, at least at this time, include waterway systems/flood prevention, power networks, IT networks, baggage systems & ground handling operations. Ground handling operations have been added due to the significant issues, lack of resilience, and loss of performance caused by the Swissport operation’s loss of capability during May – August 2014.

Management structure
The Stable Operations Board has been designed to integrate several work groups and focus areas, some of which already exist. The goal is to ensure a systems approach is taken to continuously design, measure, analyse, improve, and control infrastructure and human systems which deliver the stable operations objectives.

The figure below sets out the organisational and governance structure that will enable the Stable Operations initiative to develop and function.
Figure: Governance of stable operations

The management of investment in infrastructure to improve stable operations is managed within Stable Ops & Asset Replacement (“SOAR”) forum, which is chaired by the Head of Engineering. This group proposes asset replacement and stable ops investment projects to the Stable Operations Board, which has approval authority within established funding mandates. The mandates for fiscal year 2014/15 are £5 million for Stable Ops and £30 million for asset replacement.

The emergency management team consists of Terminal Duty Managers as its core, supported by an on-call group of Senior Leaders who serve as Duty Senior Managers, and Airfield Operations Managers who lead the operation of the airfield. This group coordinates volunteer activity and determines the first step into our Gold-Silver-Bronze emergency command structure.

The Business Continuity Management Team currently reports into the Security function. This will change during the autumn when this function will be assumed by a separate team, who will report directly to the COO.

Given the issues with Swissport over Summer 2014, we have determined to create a separate subgroup to focus exclusively on ground handling. Clearly this group handles a significant range of activities at Gatwick which are highly impactful upon passenger service and Gatwick’s reputation, including on time performance and late arrival baggage delivery.

The stakeholder group will work to enable two-way engagement with key stakeholders related to stable operations and operational resilience. The Chief Economist leads this effort with the CAA. Other roles and relationships will need to be determined.
The governance structure enables a direct engagement between the Stable Operations Board and the Executive Management Board and the Gatwick Board. A link between the Stable Operations Board and the Business Assurance Team enables broader integration and management of risk, along with a more readily available audit capability. This should also help in the development of a risk metric.
5) Asset stewardship

Introduction
Asset stewardship is the term used at Gatwick to describe the process normally known as asset management. Our PAS55 accreditation, and the audits undertaken to validate are central to ensuring that Gatwick provides optimised management for our physical assets. This section outlines Gatwick’s approach to asset stewardship, as well as our aims for continual improvement in this area.

Gatwick’s approach to asset stewardship
PAS55 defines asset management as the: “systematic and coordinated activities and practices through which an organization optimally and sustainably manages its assets and asset systems, their associated performance, risks and expenditures over their life cycles for the purpose of achieving its organizational strategic plan”. The PAS55 framework has been developed over more than six years, by over fifty public and private organisations in ten countries and fifteen sectors, incorporating feedback from users. It takes the form of a 28-point checklist for good practice in the following areas:

- Lifecycle planning;
- Cost/risk optimization; and
- Joined-up thinking.

The framework is applicable to any portfolio of physical assets and was developed originally for infrastructure assets. The framework is assessed against four levels of framework maturity. Gatwick uses Lloyds Register to undertake an independent audit.

In Gatwick’s case, Asset Management System (“AMS”) assets are defined as plant, machinery, property, buildings, vehicles and other items which have a distinct value to Gatwick.

We are committed to providing high value services to our passengers and airline customers in a legally and environmentally compliant and sustainable manner, without compromising the health, safety and security of the public, our customers and employees. In the context of our asset stewardship function, we achieve this by:

- Aligning our Asset Management System to the strategic objectives of the business;
- Managing our assets to ensure that, our passengers experience easier journeys, our airline customers find it easier to operate at our airport and hence, our shareholders’ appropriate returns are not inadvertently compromised;
- Adopting a risk based approach to the management of our assets via our asset stewardship strategies of Integrity, Performance and Condition;
- Evaluating and applying leading asset management practices;
• Ensuring that our assets are created, managed, operated, maintained and replaced to give optimal performance throughout their useful lifecycle;

• Ensuring that, as a minimum, our assets comply with statutory requirements for Health, Safety, Security and Environment;

• Setting clear objectives and targets, reviewing performance against them and publishing regular performance reports;

• Benchmarking the performance of our assets with peer organisations in a variety of sectors;

• Communicating Gatwick’s asset stewardship policy to our employees, business partners and suppliers, to help them to understand their role in ensuring that our assets deliver optimal performance;

• Ensuring that the integrity, performance and condition of our assets are regularly monitored, and reviewed. Improvement plans are developed and deployed, to ensure that our assets deliver or exceed the required performance at optimal cost, throughout their life cycle; and

• Maintaining PAS55 accreditation and continuously improving the Asset Management System.

Developing an understanding of the role of asset stewardship in the support of airport operations, the figure below shows our ‘Value Improvement Model’ for airport asset management ("a-VIM"). The a-VIM presented in the figure below is used to provide a holistic model of the AMS and in particular, to help determine the internal and external influencing factors, which can be either positive (value adding) or negative (potential issues/opportunities).
The figure and table below summarise our Asset Management System and how it is operationalised through three asset stewardship requirements (“ASRs”) and nineteen asset stewardship processes (“ASPs”). Together, these elements provide the framework for the operational, engineering and asset management teams to deliver the requirements of the Strategic Asset Management Plan helping to fulfil the requirements presented in the Asset Management Policy to positively impact on the organisational objectives.
Figure: Asset stewardship requirements

Table: Nineteen asset stewardship processes

<table>
<thead>
<tr>
<th>ASP</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>New Asset Introduction &amp; Legacy Asset Removal</td>
</tr>
<tr>
<td>2</td>
<td>Establish &amp; Maintain an Asset Information Package</td>
</tr>
<tr>
<td>3</td>
<td>Asset Criticality &amp; Risk to Airport Operations</td>
</tr>
<tr>
<td>4</td>
<td>Asset Engineering &amp; Operational Performance Requirements</td>
</tr>
<tr>
<td>5</td>
<td>Asset Life Plan &amp; Maintenance Strategy</td>
</tr>
<tr>
<td>6</td>
<td>Safe Operation of Asset to Maximise Value</td>
</tr>
<tr>
<td>7</td>
<td>Airport Risk, Contingency &amp; Continuity Plan Management</td>
</tr>
<tr>
<td>8</td>
<td>Management of Maintenance Engineering Resources</td>
</tr>
<tr>
<td>9</td>
<td>Deliver the Asset Life Plan &amp; Required Maintenance Activities</td>
</tr>
<tr>
<td>10</td>
<td>Establish &amp; Utilise an Asset Service Level Governance &amp; Improvement Dashboard</td>
</tr>
<tr>
<td>11</td>
<td>Asset Manager 1st Level Governance &amp; Service Level Improvement (VIM)</td>
</tr>
<tr>
<td>12</td>
<td>Management of Asset Abuse &amp; Significant Failure</td>
</tr>
<tr>
<td>13</td>
<td>Asset Stewardship Information Management</td>
</tr>
<tr>
<td>14</td>
<td>Management of Permits to Work</td>
</tr>
<tr>
<td>15</td>
<td>Management of Change to Physical Assets</td>
</tr>
<tr>
<td>16</td>
<td>Asset Stewardship Technical Compliance</td>
</tr>
<tr>
<td>17</td>
<td>Asset Steward 2nd Level Governance &amp; Service Level Improvement</td>
</tr>
<tr>
<td>18</td>
<td>Review &amp; Update Asset Replacement Strategy &amp; Individual Asset Management Plans</td>
</tr>
<tr>
<td>19</td>
<td>Gatwick Resilient Asset Stewardship Process (GRA8P)</td>
</tr>
<tr>
<td></td>
<td>3rd Level Governance &amp; Service Level Improvement</td>
</tr>
</tbody>
</table>
Asset stewardship enables Gatwick to manage efficiently and effectively its assets through their lifecycle stages: from i) initiation and installation; through to ii) operation and maintenance; and finally iii) replacement and refurbishment following the nineteen ASPs, while matching the requirements of the three ASRs.

**Continuing improvement in asset management**

Gatwick’s Asset Management System has been structured around the Deming Plan “Do→Check→Act” cycle of continual improvement. This has been operationalised through the nineteen ASPs and three ASRs. In particular, the three levels of governance and service level improvement: i) monitoring; ii) measurement; and iii) analysis and evaluation - provide the necessary processes, tools and techniques to deliver a continually improving Asset Management System.

Gatwick also instigates one-off improvement initiatives, which may run over a 2 to 3 year period. An example of a current improvement initiative is the ‘Competing for Quality’ (“CfQ”) operational engineering improvement program intended to remove unnecessarily maintenance activities adopting Reliability Centre Maintenance (“RCM”) and other best practice approaches to asset management and maintenance engineering.
6) Incident command and control process

Introduction
Gatwick’s Incident Command and Control Processes are set out in our Incident and Crisis Management (“ICM”) Manual. The ICM Manual details our approach to ICM, including the command and control structure, roles, responsibilities, procedures, processes and supporting tools. While the ICM manual has previously been consulted, a revised manual is due for consultation as part of the programme of stakeholder engagement. This section summarises the main parts of the Gatwick ICM process.

Gatwick’s approach to incident command and control
Gatwick recognises that incidents happen all the time. Therefore, ICM management is part of business as usual.

The severity of the impact and subsequent complexity of issues can vary significantly. Once a recognised threshold of actual or potential complexity is crossed, it is important that the appropriate senior managers and executives become involved in managing the situation. Our approach to ICM is to make sure all incidents are managed by the appropriate level of management ensuring timely decision making and access to resources. We expect the selected people to have the experience and training required to take responsibility for driving the Gatwick ICM Cycle, which is described below.

Gatwick ICM cycle
The Gatwick ICM cycle is based on five distinct steps each of which is relevant to all incidents, as shown in the figure below.

Figure: ICM cycle five steps
The time and effort taken on each step will be determined by the reality of the actual situation. The rate at which the ICM cycle turns will be driven by airport commanders, who understand the tempo of the situation. It is critical that teams always stay focused on the current reality and maintain an up to date understanding of the impacts and associated issues. The capability to anticipate the impacts and issues of an incident is seen as the key to achieving the proactive management of the situation.

Description of Gatwick ‘Three Tier Model’
Gatwick recognises three escalating levels of ICM response. The definitions of these levels are stated below:

- **Incident**: An occurrence or event, sometimes comparatively trivial in itself, which precipitates or could precipitate operational disruption and/or reputational damage;

- **Major Incident**: An occurrence or event which precipitates or could precipitate a significant operational disruption and/ or serious reputational damage; and

- **Crisis**: A decisive event or combination of events that challenges the operational capability and reputation of Gatwick Airport.

Gatwick has adapted the national Three Tier Model, as used by HM Government and national responders. Our adaptation provides a structured approach to incident and crisis management. It ensures that the appropriate levels of leadership are available to provide strategic, tactical and operational direction, decision making and resource allocation. The Gatwick ICM model is illustrated in the table below.

**Table: Gatwick ICM model**

<table>
<thead>
<tr>
<th>Level</th>
<th>Primary Function</th>
</tr>
</thead>
</table>
| **Gold**<br>Strategic Direction and Oversight (Think) | - Strategic reality check  
- Ensure compliance, regulation and Gatwick’s values  
- Stakeholder communications  
- Horizon scanning 12hrs plus  
- Direct additional Contingency Planning  
- Set reporting timelines  
- Tactical reality check  
- Ensure compliance, regulation and Gatwick’s values  
- Invoke and develop Contingency Plans  
- Institute “Hot Planning”  
- Establish planning work streams  
- Coordination of all communications  
- Allocation of Gatwick resources  
- Set reporting timelines |
| **Silver**<br>Tactical direction, planning and coordination (Plan) | - Establish operational reality  
- Action appropriate SOPs  
- Coordinate operational actions, resources and associated communications  
- Maintain CRIP  
- Regular DSM Briefings |
| **(Bronze)**<br>Implementation and delivery of tactical plans (Do) |
Escalation criteria
The escalation criteria detailed in the table below provide guidance and clarity, based on six critical factors, as to when it could be considered appropriate to escalate to the next higher level of response.

Table: Escalation criteria

<table>
<thead>
<tr>
<th>ICM Levels</th>
<th>Bronze</th>
<th>Silver</th>
<th>Gold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level</td>
<td>Incident</td>
<td>Major Incident</td>
<td>Crisis</td>
</tr>
<tr>
<td>Description</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oversight</td>
<td>DSM</td>
<td>Duty Gold</td>
<td>Gatwick Board</td>
</tr>
<tr>
<td>Escalation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IMT Lead</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Escalation Criteria Guidance</td>
<td>Expected disruption duration</td>
<td>0hrs &gt; disruption &lt; 4 hrs</td>
<td>4hrs &gt; disruption &lt; 12hrs</td>
</tr>
<tr>
<td>Reputation</td>
<td>No Impact on Business Objectives</td>
<td>Minor Impact on Business Objectives</td>
<td>Challenges Long Term Business Objectives</td>
</tr>
<tr>
<td>Passenger disruption</td>
<td>10% &lt; passenger</td>
<td>10% &gt; passenger &lt; 50%</td>
<td>&gt; 50 capacity%</td>
</tr>
<tr>
<td>Airline schedule disruption</td>
<td>20 aircraft &lt;</td>
<td>20 &gt; aircraft &lt; 100</td>
<td></td>
</tr>
<tr>
<td>Financial cost</td>
<td>100 k &lt;</td>
<td>100k &gt; &lt; 200 k</td>
<td>&gt; 200 k</td>
</tr>
<tr>
<td>Gatwick resources availability</td>
<td>80% &gt; available</td>
<td>80% &lt; available &gt; 50%</td>
<td>&lt; 50% available</td>
</tr>
</tbody>
</table>

Roles and responsibilities
This section summarises the roles and responsibilities of the parties of the Gatwick ICM process:

1) Terminal Duty Managers
Role: To provide 24/7 management cover. The Terminal Duty Managers ("TDM") act as the Bronze Commander and lead the operational response to any incident. Depending on the nature of the incident one of the other Gatwick Duty Managers may take over this role (e.g. in the event of a major security incident the Gatwick Security Duty Manager could chair the Bronze Incident Management Team ("IMT")).
2) Bronze IMT

Role: Under the direction of the Bronze Commander, the Bronze IMT delivers the sustained management of an incident through the application of the Gatwick ICM procedures and processes in order to achieve a unity of purpose across the whole Gatwick Airport community. This ensures a consistent, compliant and successful response to any incident.

Collective responsibilities

Instructions for Gatwick Bronze IMT

- On receipt of Notice of Invocation of the Bronze IMT consider the type of incident and take five minutes to gather any documentation or current information relevant to the situation;
- Make your way to the notified Bronze IMT Team meeting location;
- Receive full incident briefing from Bronze Commander and other appropriate Duty Managers;
- Contribute to initial understanding of the situation and all subsequent reviews by providing timely and accurate situation information from your department/organisation and challenging the information provided by other team members;
- Communicate your department/organisation’s views, requirements and priorities;
- Contribute regular updates to Common Recognised Information Picture;
- If protracted, arrange departmental/organisational relief;
- Fully brief relief and formally record handover; and
- If required review, agree and sign log.

Post Incident

- Support post incident debrief.

3) Gatwick Control Centre (GCC)

Role: Maintain information flow to the Bronze Commander and agreed information to Airport stakeholders.

Responsibilities:

- ESENDEX IMT Invocation messages are to be sent by GCC. Alternately, to be sent by landline;
- GCC are to call the IT Service desk to advise which IMTs have been invoked so that IT representatives can attend the appropriate IMT Meeting locations;
- On receipt of the ESENDEX message, IMT members will respond back to GCC advising of estimated time of arrival. GCC to log all acknowledgements including estimated time of arrival; and
- If GCC do not receive a response then they will telephone via landline contact details especially out of hours.

Approved ESENDEX messages are:

- IMT Message 1 – “Silver IMT activated those on call attend Destinations Place, Penthouse Suite. Remainder advise GCC of availability and ETA via text message.”
- IMT Message 2 – “Silver IMT activated those on call attend Crawley Industrial Estate. Remainder advise their availability and ETA via text message.”
4) **Duty Senior Manager (“DSM”)**  
*Role:* To provide 24/7 Senior Management cover: In particular:  
- Support to Duty Managers;  
- Oversight of Gatwick Bronze IMT Team when invoked; and  
- Gatwick Silver Commander once Silver IMT Team invoked.

5) **Primary Member**  
*Role:* To support the DSM in order to enable the efficient working of Gatwick Silver IMT.

6) **Silver Administrative Support**  
*Role:* To provide the logging and information recording support to IMT Commanders and Team.

7) **Silver IMT Members**  
*Role:* To be invoked for Major Incidents. Under the direction of the Silver Commander, deliver the sustained management of an incident through the application of the Gatwick ICM procedures and processes. The objective is to achieve a unity of purpose across the Gatwick Airport community, which can ensure a consistent, compliant and successful response to an incident.

8) **Communications Team Representative**  
*Role:* To coordinate the delivery of timely, accurate and informed communications to all Gatwick stakeholders.

9) **Gold Duty Executive (Primary)**  
*Role:* To provide 24/7 Gatwick Executive cover: In particular:  
- Routine advice and support to DSM;  
- Oversight of Gatwick Silver IMT when invoked; and  
- Gatwick Gold Commander when Gold CMT invoked.

10) **Gold Duty Executive (Secondary)**  
*Role:* To deploy to the regional Strategic Coordinating Group (SCG) as Gatwick Executive Liaison Officer in order to represent the interests of Gatwick Airport at all SCG meetings and other discussions.

11) **Gold IMT Members**  
*Role:* The Gold CMT will be invoked when an unplanned event is defined as a Crisis situation. Under the direction of the Gold Commander the team will direct the strategic aspects of the Gatwick response and recovery.
Common recognised information picture
Gatwick has implemented a Common Recognised Information Picture ("CRIP") to facilitate the cooperation of parties across the airport campus. The CRIP provides a contemporary summary of key responders’ operational status including all major impacts and issues.

The CRIP will provide an agreed picture of the following elements:

- **Airlines (Overall rating):** Details of any operational impacts on their operational capability including flights, personnel, equipment, infrastructure and supply chain;

- **Handling Agents (Overall rating):** Details of any operational impacts on their operational capability including flights, personnel, equipment, infrastructure and supply chain;

- **Emergency Services (Overall rating):** Details of emergency services locations of commanders and responders;

- **Communications Team (Overall rating):** Summary of Passenger, Stakeholder and Media perceptions and a summary of current key messages. Summary of Gatwick Communication resource availability;

- **Highways Agency (Overall rating):** Details of any issues, impacts and response on their infrastructure and organisation;

- **Rail Companies & Network (Overall rating):** Details of any issues, impacts and response on their infrastructure and organisation;

- **Local Authority (Overall rating):** Details of impacts and response on each authority and their service provision e.g. social care;

- **Caring Services/Voluntary (Overall impact):** include relevant organisations Chaplaincy, Travel Care etc. Details of any issues, impacts and response on their infrastructure and organisation;

- **Other responders if appropriate (Overall impact):** Details of any issues, impacts and response on their infrastructure and organisation; and

- **Mutual Aid:** Details of any mutual aid being provided or required.
The overall ratings for key responders’ are set green, amber or red. The table below provides a definition of what these ratings mean in the context of the CRIP:

**Table: Definition of ratings for CRIP**

| GREEN | No resources deployed beyond the normal operational response.  
|       | No disruption of normal business. |
| AMBER | Extra resources deployed and / or normal business is disrupted.  
|       | No support from other organisations required. |
| RED   | Resource at full capacity and / or normal business is disrupted. Support from other organisations required |

The figure below illustrates the current design of the CRIP.

**Figure: Current design of CRIP**

**Strategic coordination group (gold regional response)**
Where an incident has a significant impact, substantial resource implications, involves multiple organisations or lasts for an extended duration, it may be necessary to implement multi-agency management at a senior level. This multi-agency group is called the Strategic Coordination Group (SCG).
Ordinarily, the police will coordinate the Gold management level, and therefore, chair the SCG, particularly where there is an immediate threat to human life, a possibility that the emergency was a result of criminal activity, or significant public order implications. Depending on the nature of the emergency, this role may be undertaken by another agency (e.g. certain health emergencies). In these circumstances, an agency other than the police may initiate and lead the SCG.

Facilities
The main and backup facilities used by the control structure (disruption suites) are equipped with the necessary plans and systems (communication, computer and airport-specific) and stationery to enable their function to be undertaken.

A schedule exists to check the disruption suites on a fortnightly basis. These checks are recorded and sent to the IT business continuity manager on a monthly basis. We also have a rolling six monthly preventative maintenance check of the rooms with our audio visual team/experts, which is generally for fine tuning and reviewing any additional features that have been requested.

Training
Gatwick is undertaking a three year ICM readiness programme to progressively build, verify and track our capability to act in response to major incidents or crisis. The objectives of this programme are to:

- Build the required crisis management capabilities associated with Gatwick’s people, plans and tools;
- Verify the current and emerging capabilities against the agreed maturity levels;
- Track current risks and enable effective reporting; and
- Establish and embed the in house training capability.

The training programme for 2014/15 is outlined in the figure below.

**Figure: Training for Gold, Silver and Bronze**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery of year 3 training plan</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree future ICM training programme</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

All levels within the command and control structure receive bespoke training sessions. Wherever possible, these skills are exercised and Gatwick hosts at least one major multi-agency simulation exercise annually. Additionally, where appropriate, joint exercising/coaching is utilised and in this regard we have good working relationship with Sussex Police, which means that classroom and live exercising is regularly undertaken together, especially at Bronze and Silver level.

In addition, Gatwick regularly attends and participates (and helps plan) SRF exercises.
# 7) Exercises, lessons learned and evaluation

## Introduction

Throughout the year, Gatwick runs training sessions linked to our contingency plans, in association with an external specialist supplier. This section describes Gatwick’s exercise regime, it provides a schedule for upcoming exercises, as well as outlining our lessons learnt and evaluation process for contingency plans and volunteer staff training for contingency circumstances.

## Exercises

Gatwick has a comprehensive regime of exercises and de-briefing sessions to practice and evaluate our contingency plans and processes. We undertake at least one exercise, organised and evaluated by an external party each year. The programme for the exercises is co-ordinated with airport stakeholders, including, but not limited to the emergency services, councils and border force. The airline community is invited to input to the planning process and participate through the AOC Executive.

Throughout the year, Gatwick runs training sessions linked to our contingency plans, in association with an external specialist supplier. This culminates in an annual simulation exercise, which tests a number of plans at the same time. These exercises involve multiple agencies, with our airline customers and handling agents being invited to participate, both in planning the event and on the day. A full report is made available post exercise to all parties and the recommendations are tracked through the Resilience Planning Group, described in Chapter 3. The training for the next year is adapted to cover the areas of greatest need and the relevant plans that have been amended, in accordance to the noted outcomes. The schedule of exercises in 2014 is outline in the table below.

### Table: Schedule of multi-agency exercises at Gatwick in 2014/15

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree 3 year simulation exercise programme</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-Agency Simulation Exercise with 4C</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protestor Contingency Planning Exercises with Police</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shuttle Failure</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baggage Failure</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overcrowding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comms Failure, FIDs etc</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire/Pax Evacuation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Snow Plans</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

It should be noted that Gatwick participates and runs exercises beyond the annual exercise although Gatwick may not necessarily be the lead agency. Topics included in this suite are: hijack, a Mumbai style attack, Chemical Biological Radiological and Nuclear explosives, closure and major reduction in rail service and flooding.
Lessons learnt and evaluation
When the incident/disruptive event has ended, Gatwick and each agency involved in the incident should conduct its own internal debrief of its procedures, equipment, systems and contingency plans in order to assess the handling of the incident and identify any learnings which will need to be fed back into plans. These consist of a:

1. ‘Hot’ debrief – A debrief held immediately after the incident; and
2. ‘Cold’ debrief – A structured debrief usually within 3 weeks of an incident. (This might be a multi-agency debrief depending on the nature and severity of the incident.)

In addition to our evaluation process Gatwick also operates a whistleblowing scheme to encourage staff to provide honest feedback.

Training of volunteers
In addition to training for relevant members of the ICM process, Gatwick also has a programme of training for back office staff, who are called upon to volunteer to support the operation under the direction of the Passenger Captain, during times of disruption. The training of most of these volunteers (the ‘foxes’) has taken place in three stages:

- **Stage 1: The initial fox training:** These sessions cover the basics of how to contribute to a positive experience for our passengers, by assisting in the terminal, as well as the basics of our passenger welfare plans. All foxes have been issued with a detailed pack that covers frequently asked questions, important numbers, location of check-in zones;

- **Stage 2: Familiarisation:** This stage of the training consists of familiarisation tours around both terminals. This is very important to enable staff to assist in way-finding, or to help to identify emerging passenger welfare issues, including overcrowding; and

- **Stage 3: Passenger welfare:** This session provides more training for the passenger welfare and call out process, including how to deal with challenging situations and how to communicate in a positive way, if there is little information available.

In addition, volunteers are also trained to assist with “Bag loading” in the security operation. By using volunteers to assist passengers in preparing for their security scanning at times when the operation comes under stress, it is possible to deploy more highly trained staff to higher priority tasks. This training has been deployed to existing staff in the stages above, and is now incorporated in the new starter induction.

In addition to the ‘foxes’, Gatwick also maintains a force of ‘polar bears’, who are back-office staff trained to drive airside equipment, such as snow clearing equipment. The availability is significant, with 6 being on call at any one time; together with a pool of 17 trained passenger captains, c.400 foxes and c.200 polar bears, who can be called upon.
8) Overview of specific contingency plans

Introduction
We have a number of individual plans to deal with different incidents. A key part of contingency planning is to recognise that while incidents may be quite different in cause or symptoms, many incidents will have very similar effects on Gatwick, our users and passengers and will therefore require a similar response.

In this section, we summarise the coverage of the key contingency plans that we have developed:

- Adverse weather plan (including the aerodrome snow plan);
- Passenger welfare plan;
- Communicating with passengers plan;
- Surface transport plan;
- Shuttle plan;
- Loss of utilities plan;
- Baggage plan;
- Capacity reduction plan;
- Flooding plan;
- Fire plan;
- Information technology plan;
- Loss of key supplier plan;
- Loss of key staff plan; and
- Terminal overcrowding plan.

The detailed content of these plans (along the Incident Control Manual) is being consulted with key stakeholders and will be completed by 2015. This section also contains Gatwick’s statement of winter preparedness and a list of engagement with key stakeholders.

Summary of contingency plans
This section provides a summary of the contingency plans.

Adverse weather plan (including the aerodrome snow plan)
Gatwick maintains a plan to cover adverse weather. This plan covers:

- Snow, flood, heat, wind and low visibility plans for:
  - Aerodrome;
  - Terminals;
  - Surface transport landside;
  - Security;
  - Engineering; and
  - Gatwick Control Centre.
More specifically, as a sub-set, our snow plan for the aerodrome during disruption includes:

- Control and responsibility of snow and ice clearance planning and operations;
- Weather forecasting and monitoring;
- Communication and notification;
- Staff resources, call out procedures and deployment;
- Clearance techniques;
- Anti/de-icing media;
- Vehicles and equipment;
- Aircraft de-icing; and
- Diversion policy.

The aerodrome snow plan is updated and consulted on annually as part of our aerodrome licence.

**Passenger welfare plan**

The passenger welfare plan supplements any gaps in airline welfare provision to passengers. Passenger Captains have been introduced to ensure that passenger welfare concerns are properly met during occasions of disruption. These arrangements are in addition to any airline or handling agent mandatory or discretionary responsibilities, it also recognises the needs of different groups of passengers in the full range of situations that can arise.

The plan sets out:

- how various stage of activation is undertaken based on the scale or type of event;
- the organisational structure, including the roles of Passenger Captains, volunteers (foxes) and the terminal teams;
- A Control point for the co-ordination and briefing of welfare activities;
- Trigger points for passenger welfare;
- Stocks of provisions needed for passenger welfare; and
- Provision for addressing congestion, including reassurance, information zones and provision of welfare, such as water, beds, blankets, nappies, bottle warmers and children’s activity packs (among others).

As part of the passenger welfare plan Gatwick also operates a system of volunteers to assist passenger with overcrowding, way finding, queue management, providing passenger welfare, reporting issues and to help security flows by assisting in security by loading bags. Gatwick operates training programme for these volunteers, as well as refresher session, bag loader training and issues volunteers with information packs.
Communicating with passengers plan

At times of disruption, clear and timely communication with passengers is of particular importance, to provide reassurance, to help resolve situations and to enable passengers to make informed decisions about whether to travel to the airport. Effective co-ordination of messages to passenger between the airport, airlines and other parties can be challenging. For example, under some conditions when the capacity of the airport becomes restricted:

- The airport (along with air traffic control) can determine that not all flights on the schedule will be able to operate. However, the airport cannot cancel individual airline flights. In addition, the airport does not hold passenger identity lists, and therefore, we are unable to communicate with targeted passengers, and we are limited to general/public messages to all potential passengers; and

- The airlines are the only ones who can cancel their flights in response to a capacity reduction. They also uniquely hold the contact details for their passengers, and therefore they can target communications directly to those affected. The airlines also control the information on the FID screens of the airports (through their handling agents).

In this particular case, close co-ordination between the airport and airlines is necessary. Our expectation is that the processes for co-ordinating what communication is issued should be handled thought the incident control structure (summarised in chapter 6 of this document). The basic principle underlying the process is that messages will be co-ordinated through the “Silver” command structure. The command structure will ensure that:

- The state of the airport is agreed through the Commonly Recognised Information Picture;

- The impact of a capacity reduction to the allocation of capacity to airlines is decided and communicated in accordance with the capacity reduction plan; and

- Airlines will cancel flights to comply with the capacity reduction plan.

Gatwick recognises that it cannot force parties on the airport to comply with its contingency arrangements for communicating with passengers. However, we consider that for effective communication to passengers to be possible (including to help passengers determine whether to travel to the airport), parties should ensure that they co-operate with, and participate in, the Gold/Silver/Bonze command structure.

This participation should be from representatives that are adequately trained and have the delegated authority needed to carry out their functions. We also consider that it is important to recognise that the role of these representatives is not purely operational, but they also play a key part in co-ordinating passenger communication.
Communication channels
There are a number of channels used to provide disruption messages and offer advice and information to passengers – both on and off site. This section provides an overview of the arrangements in place to communicate with passengers.

In terminal messages
If appropriate, we provide passengers with accurate and timely information via FIDs/PIDs screens, video walls, the info desk digital screen, PA announcements, briefing notes for the Gatwick terminal team and volunteers, as well as through passenger information leaflets. Our welfare plan also contains the procedures for setting up information zones and the use of loudhailers and flipcharts, in the event of other modes of communication becoming unavailable.

If a significant disruption closes or evacuates the airport, all EYE media sites can be used to communicate with passengers on site.

The media
We issue regular advisory notes and updates to the media, to ensure that passengers planning to travel to the airport are aware of any disruption. When there is a major disruption event we issue updates every hour to the broadcasters (particularly TV and radio), because this is the fastest way to communicate a message to passengers. We always share our statements with the press offices of all major airlines to ensure consistency of message in passenger advice.

Twitter
We issue proactive advisory and status update messages via Twitter to communicate with passengers who access that medium and to respond to questions and queries for the duration of an incident.

Website
We update the website crisis communication box on the Gatwick home page, including a link to a relevant page or external website for more information. We refresh the message with new information as often as possible and add a date/time so it’s clear to passengers it’s an up to date information source.

Failure of communications system
Since communicating with our passengers forms a critical part of responding to any incidents we have plans and contingencies which cover the impact of loss (for whatever reason) of key passenger facing communications systems, including:

- The public address system;
- Flights information system; and
- The concurrent failure of both of the above.

The plans covers mitigating actions that can be implemented, including requesting that handling agents provide additional advice at check-in, increase of manning of information points and increasing staffing of critical points.
Surface transport plan
Surface transport forms a key link for Gatwick and impacts not only on our passengers ability to get to and from the airport, but also on the staff working on the campus. We maintain several surface transport contingency plans, the key ones being:

- **Gatwick area road access plan:** This plan has been developed in conjunction with the Highways Agency and Sussex/Surrey Police. The plan details road diversion routes which would be put into place should there be traffic disruption in the surrounding area that would have an impact on Gatwick or if there was disruption at Gatwick that would affect traffic flows in the surrounding areas;

- **Network Rail coaching plan:** This has been developed in conjunction with the rail operator and facilitates coaching capability for passengers and staff in the event of a loss or reduction of railway capacity at Gatwick; and

- **Airline divert coaching plan:** This has been developed in conjunction with airlines to enable the coaching of passengers who have been diverted to Gatwick to their scheduled destination.

Shuttle plan
The shuttle contingency plan details how Gatwick will deliver the shuttle coaching contingency plan between airport terminals should the shuttle fail and includes the management of any overcrowding within the shuttle stations and passenger flow to the alternative methods of transportation.

Loss of utilities plan
We maintain a number of plans for the loss of utilities in the form of electrical power, sewage or surface water contamination. These cover:

- **Partial and total loss of electricity plans:** These plans address loss of power from both an Engineering perspective and a Terminal perspective. The Engineering plan concentrates on fixing the infrastructure and providing temporary portable electrical supplies where appropriate. The Terminal plan deals with the impact of the loss on passengers and the airport operation;

- **Surface Water Contamination or Infrastructure Failure:** This plan ensures that the effect of any contamination or failure affecting Gatwick’s surface water infrastructure is minimised, does not affect the passenger experience or compromise compliance with Environment Agency consents; and

- **Loss of Sewage Pumping:** This plan outlines the options and actions available to the Terminal operations team in the event of a total or partial failure of sewage pumping capability.
Baggage plan
A number of baggage contingencies are available where the urgency of response or contingency implementation is defined by the priority ratings of:
- P1 – high criticality, numerous closures, high volume with limited contingency options;
- P2 – high criticality, numerous closures, high volume;
- P3 – medium criticality, numerous closures, medium volume;
- P4 – Part criticality, some closures; and
- P4 – Non critical, no immediate closures.

Capacity reduction plan
The capacity reduction plan establishes a clear and effective process for operating under reduced capacity ensuring a proportionate response to scenarios (but not limited to):
- Loss of main runway;
- Operational restriction causing reduced capacity for runway movements for a prolonged period;
- Loss of one or both Terminals;
- Operational restriction causing reduced capacity of one or both Terminals; and
- Major disruption to surface access to airport.

Flooding plan
The Flood Emergency Response Plan covers the actions that should be taken in the event of a flood affecting Gatwick airport infrastructure. Flood disruption can affect the operation of the airport in a number of ways:
- Flooding of rivers and streams adjacent to airport causing overland flooding;
- Surcharging of airport drainage network due to heavy local rainfall;
- Failure of Gatwick surface water pumping stations (mechanical or electrical);
- Blockage of drainage system; and
- Combination of the above.

Fire plan
While the likelihood of fire is considered low due to the mitigation measures in place at Gatwick, should this risk materialise the impact would be significant. As a result contingency plans are available which cover failure of infrastructure such as Total/Partial Failure of Fire Alarm System and Sprinkler System Failure as well as Evacuation Plans to ensure passengers and staff can evacuate to a place of safety.
Information technology plan
Gatwick has a set of arrangements and procedures to ensure our IT systems can operate in a resilient manner. Gatwick IT documentation is stored in Gatwick’s SharePoint (hosted in Gatwick Data Centres onsite) and/or BOX (offsite Cloud Storage) or both in some cases.

All documents with the requirement to be accessible at all times during a crisis situation, and hence hosted externally so as not to be dependent on Gatwick IT infrastructure, such as Crisis Management, Disaster Recovery, Service Continuity, and IT Business Resumption plans are stored electronically in the Gatwick Box account. This is a restricted-access web-based application. The IT Business Continuity Manager and the Head of IT Architecture & Security maintain access control to the BOX folders for Business Continuity within IT. Function Heads are responsible for ensuring that their Business Resumption Plans are uploaded.

Gatwick IT maintains comprehensive Disaster Recovery Plans for our core infrastructure, along with Service Recovery Plans for our most important (Category A Service) applications. A Gatwick IT Business Continuity Policy is in place which details the minimum standards that must be adhered to.

The IT Disaster Recovery Management Team (DRMT) is the main escalation for major IT incidents, and will take control of the overall co-ordination and management within IT.

Loss of key supplier plan
Gatwick has established a process to monitor critical suppliers proactively for early warning signs of financial instability to ensure Gatwick is able to respond and address with appropriate contingency measures on a timely basis.

In addition, as part of the Gatwick’s procurement processes, critical suppliers are monitored and contingencies identified, where appropriate. Contracts provide for the right to audit and where the business identifies significant risk, the business assurance team may be requested to review elements of the suppliers operation which may include supplier business continuity plans.

Currently, Gatwick has a list of critical suppliers and contingencies. As part of the stable operations initiative, Gatwick is reviewing critical suppliers and implementing a risk reduction plan. This list is refreshed on a six monthly basis by the Gatwick procurement team.

Gatwick has established a process to review the financial stability of critical suppliers to ensure that we can anticipate financial issues and where required, put in place contingency measures, such as auditing the supplier, seeking performance bonds, bank guarantees, etc. This forms part of the Gatwick finance key controls. In addition, Gatwick maintains some insurance for loss of critical suppliers.

Further, the risk process extends to ‘critical customers’ of Gatwick. This includes our airlines, ground handlers, NATS and concessionaires. The identified risks are maintained on our commercial risk register. Potential mitigation measures include asking for bank guarantees, amending payments term or audits.
Loss of key staff plan
Gatwick has a plan for the loss of key staff. Our plans are based around 25%, 35% and 50% loss potential, which is in line with Public Health England’s guidance for Flu Pandemic. For each of these percentage levels, we have identified the activities that will cease to enable the critical activities to continue to be undertaken.

In addition, UKBF have an established loss of staff plan, which was evoked during the March 2013 and July 2014 National Day of Strike action.

Terminal overcrowding plan
The terminal overcrowding plan details:
- Processes and procedures, accountabilities and responsibilities that allow Gatwick Airport (Gatwick) to ensure compliance to the Regulatory Reform Fire Safety Order 2005 (FSO);
- Declared capacities for areas of the building;
- Triggers that invoke action to relieve areas of congestion to maintain safe operations and passenger perception of safety and service;
- Identifying in advance, unforeseen overcrowding situations; and
- Managing unforeseen overcrowding situations efficiently and effectively, from initial recognition of build-up of congestion, to controlled restriction of flow entering the building, through to phased re-occupation.

Statement of winter preparedness
Gatwick is prepared for the upcoming winter season. Winter preparedness at Gatwick is set out in a number of separate documents and contingency plans, some of which have been reviewed as part of this process. In particular, these include:

- **Adverse weather plan:** As summarised above, this plan sets out how we will operate a resilient airport if faced by snow, including what response is activated at specific weather conditions, and the available equipment. The plan is updated and consulted on annually, as part of our aerodrome licence;

- **Passenger welfare plan:** This is summarised above and sets out how we plan to provide welfare to our passengers; and

- **Incident control manual:** As discussed in Chapter 6, the ICM sets out how the command and control process operates, as well as the process for coordinating communication to passengers.
Introduction
This section outlines Gatwick’s stakeholder engagement, our key response to consultation responses, in the form of our resilience cycle and ongoing work in this area.

Stakeholder engagement
Gatwick has been undertaking a significant programme of stakeholder engagement in developing and consulting on our contingency arrangements and plans during 2014/15. The process we have followed has included:

- We have undertaken bilateral engagement with key airline partner and other stakeholders, including providing soft copies (and in some cases hard copies) of plans;

- The Airport Operating Committee Executive membership (and where appropriate the Passenger Advisory Group) is being consulted on all plans over an agreed time period (usually 1 month) and have been given the opportunity to provide feedback;

- Some of these plans will additionally be reviewed bi-laterally with easyJet and BA;

- Where comments have been provided plans have been updated and where necessary re-consulted on; and

- We are seeking for final plans to be endorsed by the AOC executive.

Stakeholder suggestions for Gatwick’s review
We held a meeting with stakeholders on 22 September 2014, to discuss operational resilience issues. At this meeting, participants highlighted a number of areas where they suggested that further work would be useful to enhance resilience at Gatwick:

1. Gatwick to coordinate consultation on terminal fall back - how should we deal with the loss of infrastructure, beyond day one, including:
   a. Asset Utilization - ensure full use of all alternative assets; and
   b. Demand attenuation;

2. Gatwick to propose for consultation a draft Operations Resiliency working cycle;

3. Gatwick to coordinate consultation on multi-lateral coordination of passenger communications;

4. Gatwick to coordinate consultation on real time exchange of information;
5. Gatwick to coordinate consultation on resourcing adequacy and resiliency of resourcing to non-planned events;

6. Gatwick to coordinate consultation on appropriate stakeholder training for Silver Command emergency response;

7. Gatwick to propose for consultation guidelines to enable multi-lateral learning from selected real time events; and

8. Gatwick to coordinate consultation on Gatwick community passenger welfare readiness and EU261 impact.

We will be considering these areas in our work in this area going forward. We also intend to hold a further meeting in the New Year, to enable us to learn from the winter season and where possible, implement changes ahead of the Summer season.

Response to consultation - Resilience cycle

We want to thank our stakeholders for their engagement and feedback in each of the processes we have employed. In particular, we note the responses received in consulting the draft version of this document, from the ACC, British Airways, the CAA, easyJet, GATCOM, NATS, NERL and the PAG. We will be considering points made in these responses, in our work in this area going forward.

Gatwick is proposing to establish a ‘resilience cycle’ system to incorporate regular reviews and continuous improvement into our resilience. Part of the learning from the Christmas Eve 2013 event is that engagement with airline executives has historically been limited and that direct involvement with high level representatives from key airlines, including BA, easyJet, and the AOC, are necessary to enable sufficient contingency planning and to integrate such contingency plans and agree fundamental rules of engagement.

To enable improvements in integrated contingency planning, we will honour our commitment for twice annual stakeholder meetings, preceding both winter and summer peak seasons, together with adding further working sessions. The first of the twice annual meetings was held on 22 September in advance of the submission of this report. In addition, the McMillan report recommended bilateral meetings with BA and with easyJet.

The CAA has recommended that Gatwick lead engagement with its airline customers and other stakeholders to ensure clear frameworks are established and to enable a broad understanding of rules of engagement.

In addition, we want to create clear expectations for airlines for their role in business continuity management. This should include stronger ground handling agent management, capacity and demand management during disruption, integration of contingency planning, effective passenger welfare delivery, and real time teamwork during disruption events.
We intend to segment the year into seasons to facilitate focus on these priorities during appropriate periods. The intent is to alternate between periods of key delivery of services, and place additional focus on contingency planning in periods when there is less demand. We propose that these periods will approximate the following periods:

- **Summer season (delivery focus):** 15 June-15 September;
- **Winter preparation (planning focus):** 15 September-15 December;
- **Winter season (delivery focus):** 15 December-1 March; and
- **Summer preparation (planning focus):** 1 March-15 June.
Appendix 1) Compliance with regulatory guidance

This table below details Gatwick’s fulfilment of the operational resilience regulatory guidance. Text in blue reflects updates in the final guidance from the CAA, received on 23 September 2014.

Table: Regulatory guidance (CAA’s February 2014 guidance, with final guidance 23 September 2014)

<table>
<thead>
<tr>
<th>Regulatory guidance</th>
<th>Gatwick fulfilment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAA’s February 2014 guidance</td>
<td></td>
</tr>
<tr>
<td>Gatwick should have risk assessments for the infrastructure under its control and</td>
<td>Please see chapters 3 and 4</td>
</tr>
<tr>
<td>for all the services it offers at the airport</td>
<td></td>
</tr>
<tr>
<td>Clear management processes and clear communication plans should be in place for</td>
<td>Please see chapters 5 and 6</td>
</tr>
<tr>
<td>remedying and dealing with the impacts of the loss of that infrastructure or service</td>
<td></td>
</tr>
<tr>
<td>Processes and plans for the dissemination of information to passengers</td>
<td>The processes and plans for dissemination of information to passengers is addressed</td>
</tr>
<tr>
<td></td>
<td>in several of our plans:</td>
</tr>
<tr>
<td></td>
<td>• Our ICM manual sets out how information and messages are coordinated between</td>
</tr>
<tr>
<td></td>
<td>parties;</td>
</tr>
<tr>
<td></td>
<td>• Our communication plans discuss how we use various media to communicate with</td>
</tr>
<tr>
<td></td>
<td>passengers;</td>
</tr>
<tr>
<td></td>
<td>• Our communications systems plan sets out procedures for the loss of the Public</td>
</tr>
<tr>
<td></td>
<td>Address system and FIDS</td>
</tr>
<tr>
<td></td>
<td>• Our welfare plan includes provision for disseminating information to passengers.</td>
</tr>
<tr>
<td>Provision of a ‘backstop’ level of passenger welfare, where the airlines are slow</td>
<td>This is done through our Passenger Welfare plan (summary in chapter 8)</td>
</tr>
<tr>
<td>or unable to do so</td>
<td></td>
</tr>
<tr>
<td>Plans for dealing with the effect of disruption of services not operated by Gatwick</td>
<td>This is addressed through several of our contingency plans, including the loss</td>
</tr>
<tr>
<td>(such as fuel supply or groundhandling services) on Gatwick’s own operations</td>
<td>of key supplier arrangements, loss of staff and capacity reduction plans</td>
</tr>
<tr>
<td></td>
<td>(summaries in chapter 8)</td>
</tr>
<tr>
<td>Contingency plans for the loss, for whatever reason, of:</td>
<td>Please see chapter 8</td>
</tr>
<tr>
<td>• Access to key infrastructure at the airport (such as the terminals, runway or</td>
<td></td>
</tr>
<tr>
<td>airfield);</td>
<td></td>
</tr>
<tr>
<td>• IT systems;</td>
<td></td>
</tr>
<tr>
<td>• Key suppliers; and/or</td>
<td></td>
</tr>
<tr>
<td>• Key staff (including UK Border Force (UKBF))</td>
<td></td>
</tr>
<tr>
<td>For resilience plans to work effectively, they must be underpinned by solid day-</td>
<td>Please see chapters 3, 4 and 6</td>
</tr>
<tr>
<td>to-day working relations, possibly through development of formal business continuity</td>
<td></td>
</tr>
<tr>
<td>models, and the CAA would expect Gatwick to maintain clear working arrangements</td>
<td></td>
</tr>
<tr>
<td>with relevant parties.</td>
<td></td>
</tr>
<tr>
<td>SDG recommendations</td>
<td></td>
</tr>
<tr>
<td>For resilience plans to work effectively, they must be underpinned by solid day-</td>
<td>Please see chapters 3, 4 and 6</td>
</tr>
<tr>
<td>to-day working relations, possibly through development of formal business continuity</td>
<td></td>
</tr>
<tr>
<td>models, and the CAA would expect Gatwick to maintain clear working arrangements</td>
<td></td>
</tr>
<tr>
<td>with relevant parties.</td>
<td></td>
</tr>
<tr>
<td>Formal training, practices and testing of Commanders</td>
<td>Please see chapters 6 and 7</td>
</tr>
<tr>
<td>Levels of delegated authority for Commanders to be made appropriate</td>
<td>Please see chapter 6</td>
</tr>
<tr>
<td>Increasing the involvement and collaboration between airport stakeholders in the</td>
<td>Please see chapter 7</td>
</tr>
<tr>
<td>specification of exercises undertaken</td>
<td></td>
</tr>
<tr>
<td>Development of an overarching contingency plan document that includes all the</td>
<td>This document sets out the Principles, policies and processes. We will consult</td>
</tr>
<tr>
<td>principles to be followed when a disruptive event occurs</td>
<td>on this document annually, and other plans as appropriate</td>
</tr>
<tr>
<td>Development of a smaller number of plans, each covering a wider range of situations</td>
<td>Chapter 8 provides an overview and summary of the main contingency plans</td>
</tr>
<tr>
<td>and containing more information, including contact details for key personnel</td>
<td></td>
</tr>
<tr>
<td>The airports should establish, or more strongly promote existing internal systems</td>
<td>Please see chapter 7</td>
</tr>
<tr>
<td>to allow confidential reporting and establish a no-blame or “just culture”</td>
<td></td>
</tr>
<tr>
<td>Joint Business Continuity Planning Cooperation should be formalised</td>
<td>Please see chapter 3</td>
</tr>
<tr>
<td>throughout the operational resilience management process</td>
<td></td>
</tr>
</tbody>
</table>
### Regulatory guidance (CAA’s February 2014 guidance, with final guidance 23 September 2014) cont’d

<table>
<thead>
<tr>
<th>Regulatory guidance</th>
<th>Gatwick fulfilment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk management</strong></td>
<td></td>
</tr>
<tr>
<td>Provide an overarching contingency plan document and seek agreement from all relevant airport stakeholders</td>
<td>This document sets out the Principles, policies and processes. We will consult on this document annually, and other plans as appropriate</td>
</tr>
<tr>
<td>Establish clear rules for when the different command levels should be triggered</td>
<td>This is set out in our ICM manual, a summary is provided in chapter 6</td>
</tr>
<tr>
<td>Provide a formal training, practice and testing regime from Bronze, Silver and Gold commander and deputies</td>
<td>(regime to be approved by the CAA) This is set out in our ICM manual, a summary is provided in chapter 6</td>
</tr>
<tr>
<td>Establish clear levels of authority for each commander, including spending and capability to make decisions</td>
<td>This is set out in our ICM manual, a summary is provided in chapter 6</td>
</tr>
<tr>
<td>Ensure that staff rosters are established to ensure that train and qualified commanders are always available</td>
<td>This is set out in our ICM manual, a summary is provided in chapter 6</td>
</tr>
<tr>
<td>Ensure that the involvement of key stakeholders, such as airlines, forms an integral part of the Command and Control processes and there is live sharing of operational information between stakeholders</td>
<td>This is set out in our ICM manual, including our new Common Recognised Information picture. A summary is provided in chapter 6</td>
</tr>
<tr>
<td>Ensure facilities used by Command and Control are tested annually</td>
<td>Please see chapter 6</td>
</tr>
<tr>
<td><strong>Develop Engage with stakeholders to discuss and if possible agree a programme of tabletop and practical exercises to test contingency plans, which should be undertaken so as to cover all major types of contingency every two years.</strong></td>
<td>Please see chapter 7 for our organisation and programme of exercises.</td>
</tr>
<tr>
<td>Decide in accordance with risk assessment processes, the nature and number of exercises of each type necessary to ensure it fulfils its licence obligations to secure the availability and continuity of airport operation services.</td>
<td>Please see chapter 7 for our organisation and programme of exercises.</td>
</tr>
<tr>
<td>At least 3 tabletop exercises per year are recommended and at least one practical exercise relating to a non-emergency disruption situation every other year.</td>
<td>Please see chapter 7 for our organisation and programme of exercises.</td>
</tr>
<tr>
<td>Where stakeholder coordination, passenger management, information and welfare responses are tested as part of the mandatory emergency exercise which each airport is required to undertake every other year under CAP168, such exercises can be considered to contribute to fulfilling of the operational resilience condition.</td>
<td>n/a</td>
</tr>
<tr>
<td>Live events will also be considered to contribute to the fulfilling of the operational resilience condition, provided that full post-incident reviews have been carried out.</td>
<td>n/a</td>
</tr>
<tr>
<td>As far as possible the planning and exercising of the programme should be done in collaboration with relevant stakeholders. Where stakeholders are unable or unwilling to engage or agree, any identified limitations on GATWICK’s ability to carry out full and effective exercises will be taken into account in any future related regulatory action.</td>
<td>Please see chapter 7 for our organisation and programme of exercises.</td>
</tr>
<tr>
<td>Ensure that wash-up sessions are undertaken for all exercises, inviting representatives from relevant organisations to participate</td>
<td>Please see chapter 7 for our organisation and programme of exercises.</td>
</tr>
<tr>
<td><strong>Learning lessons</strong></td>
<td></td>
</tr>
<tr>
<td>Gatwick should carry out reviews of disruption incidents and of practices held jointly with other stakeholders. Where the CAA reasonably requests it, reviews of disruption incidents should be lead by an independent reviewer and, in any case, reviews should inc:</td>
<td>Please see chapter 7.</td>
</tr>
<tr>
<td>Details of cause of incident, or exercise and response</td>
<td></td>
</tr>
<tr>
<td>Degree of stakeholder engagement and participation and compliance with processes</td>
<td></td>
</tr>
<tr>
<td>An assessment of the effectiveness of current plans and processes</td>
<td></td>
</tr>
<tr>
<td>The effectiveness of welfare and information provision to passengers</td>
<td></td>
</tr>
<tr>
<td>Demonstrate that it has instituted internal procedures to encourage the reporting of honest mistakes by staff and attempt to agree procedures for open discussion with other stakeholders</td>
<td>Please see chapter 7</td>
</tr>
</tbody>
</table>
Table: Regulatory guidance (CAA’s February 2014 guidance, with final guidance 23 September 2014) cont’d

<table>
<thead>
<tr>
<th>Regulatory guidance</th>
<th>Gatwick fulfilment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CAA’s additional guidance</strong></td>
<td><strong>Gatwick fulfilment</strong></td>
</tr>
<tr>
<td>Processes for reducing demand</td>
<td>Demand reduction plan is summarised in chapter 8</td>
</tr>
<tr>
<td>Agree with airlines processes and protocols for agreeing reductions in demand during times of reduced capacity at the airport, and facilitate the process</td>
<td>Please see summary in chapter 8 for welfare plan</td>
</tr>
<tr>
<td><strong>Passenger Welfare</strong></td>
<td><strong>Please see summary in chapter 8 for welfare plan</strong></td>
</tr>
<tr>
<td>Gatwick should be clear in its plans that, if it considers it necessary during a disruptive event, it will be prepared to step in to offer a backstop level of welfare assistance and information and may recover its reasonable cost. Details on the type of assistance that might be provided should be made clear in its plans and may be agreed with airlines individually or through the AOC in advance. <strong>Seek agreement with the airline community on procedures for handling information dissemination and providing backstop support.</strong></td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td><strong>Include in its plans (including the rules of conduct required under the licence) optimum requirements for obligations on airlines regarding dissemination of information to passengers in times of disruption.</strong></td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td>Work with airlines to give due priority to giving passengers information about likely events, the relative likelihood and the potential or actual impact on flights, so as to enable passengers to take reasonable decisions about whether to go to the airport</td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td>Establish this information provision in its plans or <strong>the rules of conduct</strong> as requiring a priority (by airline and handling staff at times of disruption, relative to their own recovery activities)</td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td><strong>The airport should ensure that effective means of information provision is available in each terminal, including wifi provision and plan in place for IT and sound system failures.</strong></td>
<td><strong>Addressed through several plans, including:</strong></td>
</tr>
<tr>
<td><strong>Develop an understanding of what capabilities its airlines have to communicate with their passengers, including understanding airlines preparedness to deliver their obligations under EU 261. Use this to inform its own planning about the likelihood that it may have to step in to offer backstop provision of welfare or information.</strong></td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6). We have also included additional information on information co-ordination in chapter 8.</strong></td>
</tr>
<tr>
<td><strong>Understand airlines preparedness to meet their obligations under EU261 with regard to passenger welfare. Make sure it fully indemnifies airlines for where it has to make backstop provision and consider whether a penalty for such an outcome should be levied to be clear about how it will recover its costs.</strong></td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td><strong>Our Passenger welfare plan sets out our plans for providing backstop passenger welfare. We have also included additional information on information co-ordination in chapter 8.</strong></td>
<td><strong>Our ICM manual sets our processes for coordinating information dissemination (summary in chapter 6)</strong></td>
</tr>
<tr>
<td>Subject to confidentiality share best practice among airlines regarding passenger welfare and information response</td>
<td>Please see chapters 7 and 8</td>
</tr>
<tr>
<td><strong>Joint Business continuity planning</strong></td>
<td><strong>Please see chapter 3 and invitation to meeting on 22 September (Chapter 2)</strong></td>
</tr>
<tr>
<td>• Establish a formal process involving all key stakeholders to consider all parts of the Business Continuity Planning process, from risk identification and assessment through management of incidents on the day, training and exercising schedule for the next year to the lesson learning process. Including o At least on senior level meeting annually o Supporting meetings at the work level at least quarterly</td>
<td><strong>Please see chapter 3 and invitation to meeting on 22 September (Chapter 2)</strong></td>
</tr>
<tr>
<td>• These meetings should be specifically focused on joint business continuity planning, but may use existing forms</td>
<td><strong>Please see chapter 3 and invitation to meeting on 22 September (Chapter 2)</strong></td>
</tr>
<tr>
<td>• Opportunities to participate should be offered to airlines, ground handling agents, ANSPs other airport infrastructure operators (fuel farm), emergency services, UKBF and local authorities and other members of Local Resilience Forum</td>
<td><strong>Please see chapter 3 and invitation to meeting on 22 September (Chapter 2)</strong></td>
</tr>
</tbody>
</table>
Appendix 2) Operational resilience monitoring report – proposed format

Introduction
The CAA has requested Gatwick to produce an annual operational resilience monitoring report. According to the CAA’s draft guidance, published on 9 July 2014 (the latest comment available on the topic at the time of writing), this report should cover “…all aspects of operational resilience planning processes, from risk identification through to lesson learning. The report should identify any issues identified as problematic in any part of the operational resilience process, including any issues where there was disagreement between the airport and its stakeholders (or between different stakeholders)”. Given that Gatwick is setting out its operational resilience plan for the first time this year, the monitoring report included below sets out the format that could be followed by 1 October 2015 to report against the performance of plans and lessons learnt.

1) New risks identified and performance of contingency plans (October 2014 to September 2015)
This section will provide Gatwick’s assessment of new risks identified following publication of the first operational resilience report in October 2014, the performance of our plans and the lessons learnt.

2) Exercises conducted and lessons learnt (October 2014 to September 2015)
This section will list the exercises conducted during the year, the attendees, together with Gatwick’s assessment of the lessons learnt.

3) Changes to operational plans
Given the new risks identified, and lessons learnt from the performance of plans and the exercises conducted, this section will outline Gatwick’s changes to operational plans.

4) Stakeholder operational resilience meetings conducted (October 2014 to September 2015)
This section will list stakeholder meetings conducted during the year, attendees and a report from Gatwick on feedback received during the meetings.
5) Proposed format for verbatim consultation responses received on the monitoring report

We set out below the proposed format for comments received as part of the consultation of the monitoring report.

**Table: Consultation responses**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Consultee</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>