

Item: 7

Enterprise and Infrastructure Committee: 3 February 2026.

Civil Aviation Authority – Desktop Audit.

Report by Director of Enterprise and Resources.

1. Overview

- 1.1. As a licensee for the North Isles airfields, the Council is subject to a Civil Aviation Authority (CAA) inspection annually, alternating between an aerodrome audit one year and a desk top audit the following year.
- 1.2. CAA Airfield inspections were carried out in September 2024, with five Level 2 findings and five observations, raised between the six airfields. The response to the findings and observations were outlined to the Committee on 4 February 2025.
- 1.3. A desktop audit was carried out in August 2025 which found no Level 1 non-compliance items and no Level 2 findings across the six airfields. Only three observations were raised as detailed at Section 4 of this report.
- 1.4. The feedback from the CAA has been extremely positive, recognising the ongoing commitment of the Council to continuously improve and maintain the airfields in a safe, fit for purpose condition.
- 1.5. Following response to the observations from the CAA, the desktop audit was closed on 16 October 2025. The CAA oversight report is attached at Appendix 1 to this report.

2. Recommendation

- 2.1. It is recommended that members of the Committee:
 - i) Note the outcome of the desktop inspection carried out by the Civil Aviation Authority in August 2025, as outlined in Appendix 1 to this report.

3. Background

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

4. Desktop Audit Observations

- 4.1 No Level 1 or 2 findings were highlighted by the CAA during the desktop audit carried out in August 2025. The observations, which the CAA recommend are actioned to avoid escalation to a Level 1 or 2 finding, are outlined below:

Requirement	Details	Action
<u>Observations</u>		
CAP 168 – Chapter 9 Emergency Planning	Multi Agency Response Plans – noted that plan was not signed or dated by Accountable Manager. Further clarification in Manual re Air Traffic Control.	All Multi Agency Response Plans updated for all six airfields. Closed on 16/10/25.
Aerodrome Manual	Observations raised whilst reviewing the Aerodrome Manuals.	All updated and final versions of the Aerodrome Manuals issued to six airfields. Closed on 16/10/25.
Emergency Planning	Emergency Planning – Tabletop Exercise Exercise not carried out during Summer 2025 due to commitments associated with Island Games.	Exercise now planned for April 2026. Closed on 16/10/25.

- 4.2 The updates were completed by the Airfield Superintendent and team to address the three observations raised. The CAA closed the audit on 16 October 2025. The outcome of the airfield audits in 2024 and desktop audit during 2025 are a testament to the continuous improvement from the team.
- 4.3 Response to any CAA findings and observations has a cost implication to the Council, in terms of budget to address any infrastructure changes and staff time. The cost of responding to the findings during 2024/25 was in the region of £40,000. In addition, an airfield maintenance programme was established to address the previous observation of the condition of the runways. This has a significant cost implication, resulting in service pressure bids being submitted as part of the

budget setting process for financial years 2025/26 and 2026/27, to safeguard the operation of lifeline services.

- 4.4 The CAA have confirmed that the next Inspection of Council airfields will be during August 2026. Completion of reports for each airfield are required prior to the CAA arrival, highlighting the rigorous process involved with adhering to CAA inspections and desk top audits.
- 4.5 Safety Review Board meetings are held every four months with officers and the Chair and Vice Chair of the Enterprise and Infrastructure Committee to discuss any areas of concern and how these would be reduced or resolved.
- 4.6 Annual visits of the airfields are carried out by the Accountable Manager, with monthly visits by the Airfield Superintendent over and above the visits of the Airfield Officer for staff training. This is to ensure compliance with the Civil Aviation Authority CAP 168: Licensing of Aerodromes publication outlining management systems and operational procedures to ensure a safe and fit for purpose operation.

For Further Information please contact:

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Implications of Report

- 1. **Financial** - an airfield maintenance programme has been established; however, this has resulted in Service pressure bids being submitted as part of the budget setting process for financial years 2025/26 and 2026/27. The bid for financial year 2025/26 was unsuccessful and the bid for 2026/27 is not being progressed at this time. This means any costs associated with the work required to keep the runways to a suitable standard for lifeline services and to ensure compliance with the CAA will require to be met within existing budgets or subsidised when required by the Sustainable and Green Transport Fund.
- 2. **Legal** - the Council requires to comply with the requirements of its Aerodrome Operating Licence. Regular inspections assist the Council in complying with such requirements.
- 3. **Corporate Governance** – in terms of the Scheme of Administration, consideration of Civil Aviation Authority audit findings and recommendations and reviewing actions taken on recommendations made, is a referred function of the Enterprise and Infrastructure Committee.
- 4. **Human Resources** - The CAA audit and inspection process is to ensure a safe operation which includes the safety of the airfield staff employed by the Council.
- 5. **Equalities** – an Equality Impact Assessment is not required for audit reporting.

6. **Island Communities Impact** – an Island Communities Impact Assessment is not required for audit reporting.
7. **Links to Council Plan** - the proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
 - ☐ Growing our economy.
 - ☐ Strengthening our Communities.
 - ☒ Developing our Infrastructure.
 - ☐ Transforming our Council.
8. **Links to Local Outcomes Improvement Plan** - the proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:
 - ☐ Cost of Living.
 - ☒ Sustainable Development.
 - ☒ Local Equality.
 - ☐ Improving Population Health
9. **Environmental and Climate Risk** - the CAA audit and inspection process identifies some environmental risks which could be addressed by the Council.
10. **Risk** - the CAA audit and inspection process identifies any risks to the Council so that they can be dealt with appropriately.
11. **Procurement** - not relevant to the recommendations of this report.
12. **Health and Safety** - the CAA audit and inspection process identifies key health and safety concerns so that they can be dealt with appropriately.
13. **Property and Assets** - Orkney Islands Council is responsible for the six Outer North Isles airfields and associated airfield terminal buildings and for ensuring compliance with current CAA legislation.
14. **Information Technology** - not relevant to the recommendations of this report.
15. **Cost of Living** - not relevant to the recommendations of this report.

List of Background Papers

CAP 168 - [CAP 168: Licensing of Aerodromes | Civil Aviation Authority \(caa.co.uk\)](https://www.caa.co.uk/Cap168)

Appendix

Appendix 1 CAA Oversight Report - Closed



Oversight Report

Report Date:
16 October 2025

Details

Audit Reference Number
ADR.475

Organisation Name
Orkney Islands Council

Lead Auditor
David Hindson

Audit Type
AAA\Aerodromes\Desktop\Ongoing Oversight

Dates

Start Date
27/08/2025

End Date
29/08/2025

Closed Date
16/10/2025

Overview

A periodic desktop audit conducted to verify continued compliance with national licensing requirements set out in Civil Aviation Publication (CAP) 168 'Licensing of Aerodromes', the Air Navigation Order, the Aerodrome Licence and the Aerodrome Manual.

The Accountable Manager should confirm rectification of findings to the relevant Aerodrome Inspector by the target date shown.

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

Audit Scope

Aerodrome Manual

Licensing Documentation

Safety Management Systems

Surveys

On-Aerodrome Developments

Minimum Scale of Services to be provided

Level of Protection

Training

Emergency Planning

Response Time

CAA Audit Team

Kristian Frost

David Hindson

Observations

Number	ADR.6916	Requirement	CAP 168 - Chapter 9 Emergency Planning
Details			

OBSERVATION: Multi Agency Response Plans

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

Whilst reviewing the Manuals, the below observations were raised:

1. Section 1.1 of the Multi Agency Response Plan for all six Airfields was not signed / dated by the Accountable Manager.
2. Section 5.2.6 refers to the Officer at Air Traffic Control Tower (ATC). It should be made clear as to whether this is referring to Kirkwall ATC or a member of the Orkney Island Council staff present within the Control Room at the Airfield. As all OIC Airfields do not provide an ATC service, further clarity is required.

Closed by D.Hindson on the 16th October 2025. See correspondence entitled: "20251013 CAA 2025 Desktop Audit Report - OIC Response", which has been uploaded to SPO. All updated and final versions of the Multi Agency Response Plans for all six Airfields have been sent to asddocs@caa.co.uk and will be uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	09/12/2025	16/10/2025	David Hindson

Number	ADR.6915	Requirement	Aerodrome Manual
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Details**OBSERVATION: Aerodrome Manual**

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

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

1. The Aerodrome licences detailed at the front of each Aerodrome Manual should be updated to include the current versions that were re-issued in October 2024.
2. Eday should review section 3, paragraph 3.1 to ensure that the aerodrome reference point (ARP) longitude and latitude coordinates are correct and aligned to their most recent survey and AIP entry. It appears that the longitude and latitude coordinates for North Ronaldsay are referred to within this section.
3. Section 4.15, paragraph A, makes reference to Council Regulation (EEC) No. 2408/92 of 23 July 1992, which has since been repealed. It is recommended that paragraph A is replaced with the reference to UK Regulation (EU) No 376/2014. The wording referred to in paragraph A should be re-phrased to align with the below requirements:

In accordance with UK Regulation (EU) No 376/2014, it is necessary to ensure that all front-line aviation professionals report occurrences that pose a significant risk to aviation safety. Both voluntary and mandatory reporting systems have therefore been put in place to allow all individuals to report details of aviation safety-related occurrences, where the protection of the individual raising the safety report will be guaranteed at all times, supporting the principal of a Just Culture.

In order to encourage staff to report occurrences and enable them to appreciate more fully the positive impact which occurrence reporting has on air safety, staff will be regularly informed about action taken under occurrence reporting systems via appropriate feedback mechanisms.

4. All manuals should be updated to refer to ECCAIRS 2 throughout, to ensure consistency with regards to MOR reporting. All references to ECCAIRS should be updated to refer to ECCAIRS 2.

5. Section 6.5 of the North Ronaldsay, Papa Westray, Stronsay and Westray Aerodrome Manuals states that the main complimentary agent consists of six 8kg (total of 48kg) Monnex high performance dry powder extinguishers, however, section 6.6 states that fire appliance will hold five 8kg Monnex extinguishers (total of 40kg). The Manuals should be updated to ensure full alignment.

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

Closed by D.Hindson on the 16th October 2025. See correspondence entitled: "20251013 CAA 2025 Desktop Audit Report - OIC Response", which has been uploaded to SPO. All updated and final versions of the Aerodrome Manuals for all six Airfields have been sent to asddocs@caa.co.uk and will be uploaded to SPO.

Level	Status	Target Date	Closure Date	Raised By
AAA-Observations	Closed	09/12/2025	16/10/2025	David Hindson

Number	ADR.6929	Requirement	Emergency Planning		
Details					
OBSERVATION: Emergency Planning - Summer Tabletop Exercise					
It became evident that due to the Orkney Islands hosting the Island Games, the scheduled Multi Agency Tabletop Exercise for summer 2025 had been postponed to Spring 2026. OIC should advise the Aerodrome Inspector of a confirmed date and planned scope of the exercise.					
Closed by D.Hindson on the 16th October 2025. See correspondence entitled: "20251013 CAA 2025 Desktop Audit Report - OIC Response", which has been uploaded to SPO. OIC's next multi-agency table-top exercise is now planned for the 8th April 2026.					
Level	Status	Target Date	Closure Date	Raised By	
AAA-Observations	Closed	16/12/2025	16/10/2025	David Hindson	

Report issue	
Issued to	Original Report Issue Date
Symeon Grayson	17/09/2025