

## **Comment Response Document: A Proposal to Publish CAA Safety Performance Indicators on the CAA Website.**

### **Introduction**

Between 16<sup>th</sup> November 2009 and 15<sup>th</sup> February 2010, the CAA consulted on its intention to publish safety performance indicators on its website. Following the consultation, the responses were reviewed and a way forward agreed with the CAA Board. This document contains a summary of the CAA's conclusions following the consultation and a transcript of the comments and responses (attachment 1).

### **The Consultation**

The consultation document comprised a letter of consultation, together with an attachment showing the proposed graphs and accompanying text, and an example of a list of serious events.

The letter of consultation posed the following three questions:

1. The CAA believes that a balance must be struck between providing informative safety data and protecting the confidentiality of the MOR scheme. In this context:
  - a. Do you believe that the SPIs shown in Attachment 1 are sufficiently informative?
  - b. Do you believe that the publication of these SPIs will have an impact on the confidentiality of the MOR scheme?
2. Do you believe that the format used presents the data in the right context?
3. Do you envisage this change having an impact on your own business and if so, what is that impact?

### **The Response**

There were 19 respondents in total, ranging from UK airlines to aviation consultancies.

The response to question 1a was positive, with 14 out of 19 respondents (74%) agreeing that the SPIs are sufficiently informative. One commenter stated that the SPIs are meaningless to paragliders and hang gliders and the CAA agrees – we do not regulate them so data regarding this class of aircraft is not included. Other respondents who disagreed typically suggested more data that is either not available, is published elsewhere or would compromise the confidentiality of MORS.

Respondents also agreed with question 1b: 12 of 19 respondents (63%) agreed that the publication of SPIs would impact on the confidentiality of MORS. This response relates to the publication of a list of serious events, with concern over the identification of sole UK operators of particular aircraft types and even with the identification of crews within a company through the use of the date, route, aircraft and location. Respondents who chose “no” were either not reporters to MORS or did

not think that the graphs posed a problem but still held reservations regarding the list of serious events. With one exception, all those respondents who report to MORS to CAA stated that the serious events list could affect the UK reporting culture.

The response to question 2 was very similar to question 1b: 11 of 19 respondents (58%) agreed that the format used presents the data in the right context. The positive comments were varied, but included suggestions for further analysis such as comparisons with Europe and the rest of the world, the use of rates instead of numbers and graphs using different timescales in order to raise the number of events per data point. All of these suggestions have been considered and where possible will be incorporated. Where they cannot be incorporated similar ideas are already planned to be published alongside the SPIs (for example worldwide fatal accident rates by region). Of the eight negative responses, three related to the serious events list, two suggested that more detail should be shown in the graphs, one suggested a minor modification to the graph, one made no comment and one commented that the graphs were of no use to paraglider and hang glider pilots.

The response to question 3 received 15 positive and 4 negative responses (79% and 21% respectively). Ten of the 15 positive responses related to concern over the serious events list. Two did not provide comments in this section, having previously discussed the impact on their companies in question 1b. Two made comments unrelated to this consultation, and one (a consultancy) speculated that the increased interest in safety might result in an increased demand for their services.

### **CAA Conclusions**

Respondents were supportive of the graphs shown and also supportive of the initiative to publish SPIs. There were requests for further detail and suggestions for amendments to the graphs to include rates of occurrence where only numbers are shown. These suggestions will be incorporated wherever data is available and forms a meaningful analysis, provided that the confidentiality of MORS is not compromised.

Where requests were made for data already published, links will be added to the webpage directing readers towards the information. This is particularly important for general aviation, where GASILs and the Aviation Safety Review already provide detailed statistics relating to this industry sector.

Respondents who report to MORS were anxious that the confidentiality of the scheme would be compromised by the list of serious events. Many valid points were made: the identification of the airline through either the route or the aircraft type (or both); the possibility for individuals to be identified by their colleagues; and the difficulties associated with having an event published in the serious events list without prior notification from CAA (as CAA does not provide reporters with the occurrence grading).

Having reviewed the consultation responses, the CAA has decided to proceed as follows:

- It was clear that there was interest in the publication of actual indicators in the form of graphical information, so the CAA has undertaken to publish these on its new safety pages from August 2010.
- It was clear that there was considerable concern regarding the impact on the confidentiality of the MOR scheme of publishing lists of serious events, therefore the CAA will not be making these publicly available.

The CAA will continue to welcome feedback regarding the safety performance indicators, especially once they are published and following any amendments to the indicators that we monitor. Correspondence can be sent via email to [spi.queries@caa.co.uk](mailto:spi.queries@caa.co.uk).

## Attachment 1: Comment Response Transcript

### Question 1: Do you believe that the SPIs shown in Attachment 1 are sufficiently informative?

Commenter	Comment		CAA Response
1	yes	nil.	None.
2	yes	nil.	
3	yes	Yes. However the claim to identify 'Serious Incidents' there is an element of subjectivity in this claim which may not be fully appreciated in the public domain.	To clarify, the dataset covers "Serious events", which are categorised by the CAA's Safety Data Unit. The team are skilled staff that use robust procedures and the categorisation of all serious events is reviewed by CAA senior management. "Serious Incidents" are classified as such by the AAIB, using the guidance contained in Annex 13 to the Chicago Convention.
4	yes	nil.	None.
5	no	Whilst we generally support the objectives of the proposal and agree the appropriateness of the indicators currently proposed, we believe additional specific data relating to the CAA's strategic safety initiatives could provide a worthwhile indication of the effectiveness of the CAA's work in those areas. Further specific data on current global aviation safety challenges, e.g. runway excursions, could additionally provide a clear indication of the joint CAA / industry efforts to address such problems.	The publication of SPIs is viewed as a progressive process and the CAA may consult on further SPIs in the future. Furthermore, future versions of the Safety Plan will contain data relating to the CAA's strategic safety initiatives and information regarding worldwide fatal accidents may be found in CAP 776 (available at <a href="http://www.caa.co.uk/cap776">www.caa.co.uk/cap776</a> ).

<b>6</b>	no	a) For GA there is little point in lumping together microlights, gliders, gyroplanes, balloons etc as you will not be able to see the wood for the trees. Older gyros have a terrible record per flying hour and would bias the data for the rest of the group. Anyway gliders are normally put more store on launches rather than hours. Also there are a lot more microlights and gliders on the UK register than helicopters. I strongly suggest that as the hard bit is gathering the data, it would be more useful to keep the different activities separate, with three classes per graph it will only add a couple of extra graphs but make it more useful to all and sundry, including the CAA, EASA and the GA organisations. b) That is why I have ticked the NO box above.	The SPIs are intended as a brief overview and not a detailed analysis. However, the details suggested are already published in the Aviation Safety Review (currently CAP 780) and in the regular GASILs. Both of these are available on the CAA website, with the update of the Aviation Safety Review currently scheduled to be published in November 2010.
<b>7</b>	yes	nil.	None.
<b>8</b>	yes	Nothing to add per attachment 1. However, the proposal indicates that the contents of attachment 1 would be supported by information outlined in attachment 2 - and it is here that we have reservations; see Q3 below.	Comments will be addressed in Q3.
<b>9</b>	yes	Provided the Performance indicators are sensible.	The CAA believes that they are.
<b>10</b>	no	The SPIs as defined by the CAA should be measurable, directional, practical and actionable. In order for operators to gain benefit and enable benchmarking of the data, the information should be available in an analysed format as below. 1. Graphical with trend information by SPI on top 10 or 20 events by type ie runway incursion, level bust etc. 2. Examples, Tailored listings by SPI. 3. Root cause analysis and preventive information by occurrence (effectiveness measured by 1 above)	It should be noted that the four SPIs proposed to be published are not the CAA's full suite of SPIs; they are the high-level indicators. Although it would be useful to divide the indicators into the top 10 or 20 events by type, this is unfortunately not practical within the current dataset as there are too few incidents to draw any statistical significance once they are divided into 10 categories. Examples and root cause analyses could not be published, since this would compromise the confidentiality of the MOR scheme.
<b>11</b>	yes	yes they seem appropriate	Agreed.
<b>12</b>	yes	nil.	None.

13	yes	Publishing the 4 categories of SPIs, as a straightforward number or rate of events in graphical form, is sufficiently anonymous and visually indicative to give a summary of performance over a period of time. These graphs are sufficient to show a member of the public the on-going serious safety event occurrence number and rate over a period of time giving the required information on trend.	Agreed.
14	yes	The graphs, although examples, suggests that one needs to delve deeper into the detail in order to make a full assessment of what the data is revealing. It is possible that the publication of SPIs in this format will emphasise the lack of detailed information and prompt an increase in requests for further information. There has been much debate in recent months and years about the inappropriate use of airline company data, in relation to safety data. Some newspaper articles have attempted to analyse safety data in such a way as to identify particular organisations with worse safety records than others. This has resulted in the removal of airline company information from individual incident summaries. It is possible that a similar use could be made of airport location information, e.g. which airport company has the most UK Serious Events. The inclusion of airport location in the serious events summary provides potential for this type of analysis and the possibility of the data being misrepresented, e.g. numbers of serious events published regardless of the number of aircraft movements handled by any particular airport. Instead of using specific airport location, it would be preferable to use the region of the UK as the location - e.g. London, South-East, south-west, midlands, north east, north west, Wales, Scotland, N Ireland. The use of regional location identifiers for publicly available data will help to ensure that the UKs safety reporting culture is not adversely affected.	<p>We agree that one would need to review the data to a greater level of detail in order to understand the main event types, causes and consequences. However, the purpose of these SPIs is to show at a high-level the current safety situation; these SPIs are not intended to provide a detailed analysis.</p> <p>The CAA has considered the possible inappropriate use of its data and has taken steps to mitigate this risk.</p> <p>There are numerous problems associated with publishing the list of serious events that have been raised through this consultation. In addition to location identifying airport operators, the aircraft type can identify the aircraft operator, as can the route. However, a report describing an occurrence involving a “medium twin-engine turbine aeroplane” at a “London Airport” is plainly not as illuminating as one which describes a DHC-8 at Gatwick. Given the concerns expressed by respondents regarding the publication of the serious events list and yet the obvious weakness of a fully disidentified list, the CAA has concluded that it will be preferable not to publish the serious events list, but to retain it’s current policy regarding information requests.</p>

15	yes	<p>YES, provided the Authority continues to make available, to all previous authorised recipients, the more comprehensive and detailed monthly Occurrence Lists on Fixed Wing (aircraft &gt;40,750kg), Fixed Wing (&lt;40,750kg), Rotary Wing and ATC. There is, however, insufficient detail in the proposed new public service to replace these existing publications.</p>	<p>The identified monthly MOR listings are not related to the proposal to publish Safety Performance Indicators as these are different data sets aimed at different audiences. The Safety Performance Indicators are not intended to replace the existing monthly MOR listing, but to provide additional information to a wider (public) audience on general statistics. Therefore, any decisions regarding access to the monthly MOR listings are unrelated to the publication of Safety Performance Indicators.</p>
16	no	<p>the SPIs are meaningless to hang glider and paraglider pilots as they contain no information of any use.</p>	<p>Agreed. This is because we do not regulate hang glider and paraglider safety. However, we would be very happy to add a link to BHPA safety statistics on our SPIs page.</p>
17	no	<ol style="list-style-type: none"> <li>1. The data relates to "serious events". There is no declared definition of a serious event. It does not map directly to any ICAO, EASA or UK Airprox Board definition. Without public declaration of the criteria, the data is less than informative.</li> <li>2. There is no qualitative measure. Is a constant rate of around 41 UK commercial air transport serious events/rate a concern? How does it compare with other EU and Non-EU nations?</li> <li>3. The number of events in SPI3 appears to be very small numbers and random. It is not sufficiently informative.</li> </ol>	<ol style="list-style-type: none"> <li>1. It is intended that further detail regarding the criteria for a serious event is published alongside the SPIs. The CAA uses the same grading system across the industry sectors it regulates, so a description encompassing all event types is difficult to provide within the context of a consultation document, however we do recognise the need for a more detailed description. ICAO accidents and serious incidents are defined in relation to the type of event, so they have a broader range of severity than UK serious events. However, it is rare for an ICAO serious incident not to be considered a serious event by CAA. Similarly, the UKAB risk grading is designed to consider a specific event type and so although the grading is very similar to CAA's it is not identical. European-level risk grading is in development, and the CAA hopes to be able to apply it when it is mature.</li> <li>2. The CAA considers the qualitative measure to be continuous improvement; hence it's current concern regarding SPI2. There unfortunately cannot be comparisons between other states in this particular area because the data do not exist. The UK is considered a world leader in its reporting culture and hence has comparatively good information regarding serious events, however in other parts of the world these occurrences are often not reported. Figures comparing the UK and the rest of the world are usually based on fatal accidents, since these are, by their nature, the most reliable dataset, and this information is planned</li> </ol>

			<p>to be published on the same web page as the SPIs.</p> <p>3. The number of events in SPI3 is indeed very small, but it uses the same grading criteria as the other "serious event" SPIs. Alternative data presentations have been reviewed in the past, such as using moving averages, however we have found this less effective than simply showing the number of occurrences.</p>
18	yes	no comment.	None.
19	yes	nil.	None.

**Question 2a: Do you believe that the publication of these SPIs will have an impact on the confidentiality of the MOR scheme?**

Commenter	Comment	CAA Response
1	yes The use of specific aircraft type can readily identify the author. Examples are SF 340 = Loganair, J41=Eastern Airways, J 31=Highland Airways. This could generate "bad press" for the company involved leading to a reluctance to file the MOR. It is quite clear that some companies have a reporting culture and others do not and the management perception does count. Could the identification be "turboprop" "Large jet" "Single engine piston" etc (or similar) as this does not identify the operator?	The CAA agrees with this and other commenters regarding the threat to the MOR scheme from publishing the listing. Numerous problems with publishing the listing have been raised, from identifying operators of unique aircraft types to the possibility of individuals in small companies being identifiable by colleagues through the location, aircraft type and date. This is not acceptable and would damage the excellent reporting culture developed in the UK over the past three decades. Attempts to totally disidentify the data have not been successful, as the result renders the report too generic to be useful. It has therefore been concluded that the CAA will not publish the listing, but will retain its current policy regarding data release, as described in Regulation 9 of the Air Navigation Order.
2	yes No more info is given than current listings therefore all OK.	This listing identifies that the CAA considered the occurrence a "serious event" and makes it publicly available. The listings referred to by the commenter are only available to members of the MOR scheme and does not differentiate between serious and other events.

3	yes	In the section entitled "Attachment 2 to Letter of Consultation Generic Examples of Serious Events. Shown as they would appear on the web site". Publishing this data on the web site has the potential to damage the confidentiality of the MOR scheme because the operator can be identified from the type of aircraft and location of the event.	Agreed. Please see the response to Q2a Comment 1.
4	yes	No, however, I am slightly concerned that, despite the suggested format, there may still be the possibility of identifying the airline involved. For example, if the location is not particularly busy or large and there is only one 737 operator (or maybe two) that generally uses that airfield, then it would be easy to surmise who the operator is likely to be. For that reason, I could see the scheme affecting the confidentiality of the MOR scheme and hence the present excellent reporting culture in the UK.	Agreed. Please see the response to Q2a Comment 1.
5	yes	The proposals to protect reporting persons go some way towards safeguarding confidentiality, however it is likely that statistics could be used out of context and sensationalised by the less scrupulous sections of the media to meet their own headline needs. We offer a further safeguard for consideration. Any reader of the data could be asked to acknowledge that it is provided to give general safety performance indication and that the source reports were provided with the aim of improving aviation safety and that they accept that the inappropriate use of the data could harm the reporting system and ultimately hinder safety improvement.	The interpretation of such a statement could be subjective and would be difficult to enforce, given that any action taken would be following a breach of the agreement, by which time any damage to confidence in the reporting scheme would be done.
6	no	Because the above are not MORs but accidents which are in the public domain via the AAIB Bulletin.	This is true for the GA indicator (SPI4), but not for other occurrences in the list.

7	yes	<p>Publication of the Safety Performance Indicators will provide an opportunity to drive change. However, the provision of the list of contributing events in the proposed format will enable organizations and possibly reporters to be publicly identified. This will discourage staff and organizations from participating in the MOR scheme. Though the narrative is useful in understanding the contributing factors to an SPI, I would ask the CAA to review if providing unrestricted access to information that can be used to identify the reporter/organization i.e. Aircraft Type, Location, exact date. enhances safety. May I suggest that such information is available for the purposes of enhancing safety through a restricted site, similar to the site for the MORS Monthly Listings.</p>	<p>This comment is partially addressed by the response to Q2 Comment 1. Regarding the MORS monthly listings, it may be preferable to indicate on the listings themselves whether an occurrence was classified as a serious event, rather than creating a new site. This option will be investigated, but is not related to this consultation.</p>
8	no	<p>Subject to the comments in the answer to Q3.</p>	<p>Addressed in Q3.</p>
9	yes	<p>The main concern is that by identifying the aircraft type and/or airport within the SPIs it will be possible to identify the operator. From past, bitter, experience the media have been known to take such information and come to incorrect and potentially harmful conclusions. There is actually little to be gained by anyone outside the aviation industry knowing the aircraft type involved or the location of an incident. As an example, any mention of a UK registered A300-600 will easily identify it as [one company] or and any mention of a Dash 8 Q400 will point to [another company] Similarly if a particularly large and busy airport has a number of incidents the media may say it's less safe than the small regional one because they would not be taking into account any sort of rate data.</p>	<p>Please see the response to Q2a Comment 1.</p>

10	yes	Operators can be identified by the type of equipment, route structure or operation. A permissions based access similar to that of the electronic MOR listing registration should be used and monitored for security. It is good news that data which can be used to identify individual operators is denied under the freedom of Information act s.44.	This comment is partially addressed in the response to Question 2, Comment 1. The CAA does not agree that permissions-based access should be used, since the aim of publishing these SPIs is to be more open to the public. The SPIs have the potential to identify operators because SPI-2 is specific to UK operators. This does not necessarily apply to other data requests received by CAA.
11	yes	The SPIs themselves no. But the de-identified example of MORS still pose a problem for us. Even by removing the registration and operator it is still easy for someone to identify who was operating a regular service with an uncommon type between to regional airports. It is a concern that the public would have easier access to Serious Events MORs than any other. If the media wanted some information to use against an airline it would be a very good place to start. Those who have a legitimate requirement for these statistics would go through their Flight Safety Officer to the SIDDD listings or contact the SIDDD directly.	Please see the response to Q2a Comment 1.
12	yes	<p>Yes, because the proposal to accompany the data with a list containing a brief narrative of each event contributing to the SPIs gives very specific information. This will erode the confidentiality of the MOR scheme. Although operators and individuals would not be named in these occurrence narratives, there are several airlines in the UK who operate a type unique (or almost unique) to themselves. This process would discriminate against these airlines by giving the public, i.e. the press, easy access to statistical information on safety events. Other airlines, those who operate a common, or popular, type would continue to enjoy anonymity.</p> <p>The CAA Monthly MOR listing consultation proposed that only the secure website would contain specific Aircraft Type and Operator details. The Public Reference would not give specific type information – only Large 4 engine jet aeroplane, for example. This would seem to be a fair and logical format for</p>	Please see the response to Q2a Comment 1.

		the brief narrative of each event for the SPIs, which would not detract from providing informative safety data.	
<b>13</b>	no	Publication of the graphical data is unlikely to have any impact on the MOR system or reporting culture as there is no link to company, aircraft type or type of operation with commercial aviation. Our major concern surrounds the brief event narrative as shown by the examples in Attachment 2. Although it is not intended to disclose the identity of operator and individual in the reports, the clarification of aircraft type may effectively identify the operator. With respect to our company in particular, as we are the sole operator of one aircraft type in the UK, any events related to that aircraft type described in the summaries will obviously identify the operator. Placing this information in the public domain attributed to a specific operation will possibly have an effect on the reporting culture of the pilots operating within that company.	Please see the response to Q2a Comment 1.
<b>14</b>	yes	As in answer to Q1, it is likely that the publication of these graphs will encourage otherwise disinterested parties to wish to know more and this will lead to an increase in requests for the full detail related to any specific event. The increase in requests for information will lend weight to the lobby for public access to safety data and could have a negative impact on the reporting culture.	The CAA has an established procedure regarding the release of data and an increase in the volume of data requests would not prompt the CAA to change its policy to release more information per report. Some of the serious events covered by the SPIs are made available as AAIB and UKAB reports, however the investigations by AAIB and UKAB often take a number of months and are not likely to be made available at the same time as the SPI information. Release of confidential information could deter reporters from reporting occurrences, thereby denying the CAA and the UK public at large the safety benefits of such a mature scheme. It is vital that the UK industry trusts that the CAA will protect confidential information, in order to maintain the reporting culture.

<b>15</b>	no	NO, in our opinion, the detail of the information provided is not sufficient to endanger confidentiality. However, if this new service goes ahead, it might lead to some additional requests to the Authority for more detailed MOR data. It would therefore be useful to spell out, in the publicly available information, the circumstances under the Freedom of Information Act when additional data can or cannot be released and why. This is already explained in Section 2 of the Letter of Consultation. Our suggestion would be that this explanation is provided in the publicly available information. In this respect, it is worth noting that the provision of more publicly available information should lead to less information requests to the Authority, rather than more.	As the explanation regarding information available under the Freedom of Information Act has already been given in Section 2 of the Letter of Consultation, there is no reason why it could not be included in the same place as the public information. Comment noted for future consideration.
<b>16</b>	no	We do not participate in the MOR scheme so can not comment. We do not believe that publicising our accident statistics has any affect on our own reporting system.	Agreed. Please see the response to Q1, comment 16.
<b>17</b>	no	We see no immediate link between statistical reporting and actual safety reporting under the MOR scheme.	None.
<b>18</b>	no	no comment.	None.
<b>19</b>	yes	Yes, publication of aircraft fleet types and operational bases will allow public identification of company sensitive information. This may then limit an open reporting culture which forms the basis of developing safety management systems creating a constraint on safety performance improvement - the reverse effect of that intended.	Please see the response to Q2a Comment 1.

**Question 2b: Do you believe the format used presents the data in the right context?**

Commenter	Comment		CAA Response
1	yes	nil.	None.
2	yes	Helicopter serious event graph could be compiled annually, instead of quarterly reducing the number of zero points. A particularly bad year could then be broken down into quarters.	We have found in the past that the x axis is better understood when it is a consistent measure, rather than switching from annual to quarterly. However, we agree that the numbers are very low, making trend analysis very difficult.
3	no	It is open to misuse and misinterpretation by members of the public.	The public are free to interpret the graphs as they chose. The list of serious events will not be published – see CAA response to Q2a, comment 1.
4	yes	In light of my comment in number 2 above, if aircraft type or location were removed then I believe confidentiality would not be compromised. As an alternative 'half way house' perhaps instead of saying Boeing 737 or 757 etc, simply Boeing or Airbus could be recorded. Otherwise, I think the format suggested is excellent.	The problem with publishing aircraft type by manufacturer is that there are some airlines who are the only UK operator using a particular manufacturer's aircraft. The CAA's decision regarding the list of serious events is discussed in the response to Q2a Comment 1.
5	yes	nil.	None.
6	no	Comment a) above	None.
7	yes	nil.	None.

8	no	Para 3 of the letter of consultation, [Proposal], indicates that 'Accompanying the data would be a list .....'. The para; concludes by stating; 'It should be noted that operators and individuals would not be named in these occurrence narratives.' There is only one operator of EMB 195 to [for example] Aberdeen; and only one operator of SIK S92 to Scatsta. This compromises the privacy the CAA are attempting to assure. Suggest that a reasonable balance could be achieved by only defining the 'location' as an airport if the report itself is location critical and routinely defining the location as the FIR. Thus, in the examples above, both reports would have 'Scottish FIR' as their location unless the report referred to something specific, for example a runway incursion.	Please see the response to Q2a Comment 1.
9	no	The actual graphs are good but as above the detail in the associated individual incident information should be totally de-identified.	Please see the response to Q2a Comment 1.
10	no	1. Depiction over a defined period of how each SPI is moving in terms of direction & magnitude is welcome. 2. The listing supplied (SPI2a) is too broad, it encompasses all sorts of occurrences which fall under the entire SPI listing, ranging from Bird strikes, Airprox, Technical failures, ground confliction, wake turbulence etc. A better format would be a breakdown of listed occurrences for the same period analysed by SPI with annotated 'hot-spots' adverse trend data etc. (i.e. significant events and trend data) 3. To close the circle, beneficial information could include what industry has done or is doing (good ideas sharing tailored by equipment i.e. B738, route structure, type of operation etc) to reduce either the severity of occurrences, the frequency or both.	SPI2a is intended as a broad overview of serious events involving commercial air transport aeroplanes. The numbers associated with the graph are too low to divide into event categories, although this is work that is applied to lower severity occurrences. The CAA agrees that information regarding safety interventions and sharing of good ideas is beneficial, however this is not the purpose of these very high-level SPIs.
11	yes	On initial evaluation they seem adequate.	Agreed.
12	yes	Yes, the graphs show trends adequately	Agreed.

<p><b>13</b></p>	<p>yes</p>	<p>Graphical presentation of trend data based upon rate as used in SPI 2 and 4 is the best way or presenting results in the public domain. A presentation using pure numbers as used in SPI 1 is very dependant upon the volume of traffic and may vary considerably due to economic or other external effects giving distorted results that may not be easily appreciated by members of the general public. This concern also extends to SPI 3, Serious Events Impacting on Air Traffic Service Safety in UK Controlled Airspace, as this category will include events concerning non CAA-regulated operators and, therefore, the numbers may vary considerably due to factors outside the UK and a recording of rate would be more applicable. In addition, if the proposal involves the publication of 4 different SPIs, the method of recording should be identical across all 4 elements.</p>	<p>The CAA agrees that rates are preferable, however utilisation data to create the rate is not always available (as is the case in SPI 1, where we cover all flights in UK airspace and UK aircraft overseas). Furthermore, external effects such as the downturn may have affected the industry in various ways before the number of flights reduced, so a rate will not always totally remove the effect of external factors. At present, SPI1 does not show a correlation with either UK public transport movements or flights in UK airspace.</p> <p>For SPI 3, the number of events over the period of the graph is so low that the rate is always changed more by the number of events than by the utilisation. In cases such as these, our experience is that it is more useful to the audience to see the number of events than the rate. Since the SPIs shown are not mutually exclusive, it is not strictly appropriate to compare the rates in each category.</p> <p>The decision to monitor serious events (which form a very small proportion of the database) is partially driven by the need to monitor data that is consistently reported. Serious events in SPI3 are typically observed by both the controller and pilot, and may involve more than one aircraft. Where foreign aircraft are concerned, the initial report to MORS is often submitted by the ANSP, and if a report from the operator is not forthcoming the CAA will contact our overseas equivalents.</p>
<p><b>14</b></p>	<p>yes</p>	<p>Yes, as long as the event rates are also published. It may be beneficial to provide comparative graphs for the rest of Europe, America, Africa or the whole world so that the overall UK situation can be seen in a wider context, revealing the positive, proactive nature of the UK safety culture and safety management systems.</p>	<p>Notwithstanding the point made in response to comment 13, above, event rates are published where possible. Data relating to serious events is not available at an international level, however it is the CAA's intention to publish data that relates to the UK's performance in a global context and indeed does already publish information relating to worldwide fatal accidents. European-level SPIs are currently in development with EASA, but these are unlikely to compare European countries to each other, as this may discourage reporting.</p>

<b>15</b>	yes	YES, given that this is summary information of serious events only. It would be misleading to present the data broken down by any other sub-category over and above those already provided. Regarding the format of the Safety Performance Indicators, it would be very helpful if tables were provided showing the exact values underlying the graphs. It would also be helpful to make clear what is classified as a serious event. What subset of occurrences does this encompass? Is a serious event the same as a serious incident? How do these relate to ICAO definitions?	Tables of the exact numbers of figures were considered as part of the preparation for the consultation, however in the context of publishing the data using a single web page per graph, it was decided that it would be better not to add this information. The description of a serious event within the letter of consultation is intended to be expanded upon (see response to Q1, comment 17). Serious events are not directly related to serious incidents, but it is very likely that an AAIB-classified serious incident would also be a serious event.
<b>16</b>	no	see 1. above. The format shows no meaningful information to pg and hg pilots.	Agreed. Please see the response to Q1, comment 16.
<b>17</b>	no	SPI3 would be more useful if shown over a 10 year and 3 year rolling rate.	Over a ten-year period the aviation system, including the fleet mix, operators and regulatory environment, will have changed substantially, and this cannot be shown within the SPI itself. Hence, although we show the ten-year period in order to put the graph into context, the CAA uses a five-year period as its SPI. The graphs are updated quarterly not least because it provides the opportunity to review the events internally on a regular basis.
<b>18</b>	yes	no comment.	None.
<b>19</b>	no	nil.	None.

**Question 3: Do you envisage this change having an impact on your business?**

<b>Commenter</b>	<b>Comment</b>		<b>CAA Response</b>
<b>1</b>	yes	If the operator is identified it will have an effect on the business	Please see the response to Q2a Comment 1.
<b>2</b>	yes	Heightened awareness of serious incidents	None.
<b>3</b>	yes	Potentially this data can be linked to a specific operator and used on the internet out of context and therefore it is possible that this could be damaging to business.	Please see the response to Q2a Comment 1.
<b>4</b>	yes	Possibly subject to comments in 2 and 3 above, however, as an airline we tend only to fly into major airports hence my concerns above are unlikely to pertain to our operation.	Please see the response to Q2a Comment 1.
<b>5</b>	yes	If anything, the more public availability of such safety data could motivate organisations to take action to address safety issues relating to safety initiatives supported by the data and relevant trends both individually and collectively. This could create increased demand for training and consultancy services.	None.
<b>6</b>	no	nil.	None.
<b>7</b>	yes	nil.	None.
<b>8</b>	no	no comment.	None.
<b>9</b>	yes	There is potential for this change to have an impact if total confidentiality is not maintained.	Please see the response to Q2a Comment 1.

10	yes	The above would require some analysis on the part of the CAA, it would ensure that informal industry partnerships are built (in addition to the more formal working groups) and enable performance improvement by operators working together and as individuals to reduce risk. The model for this is described on p12 of the CAA safety plan update - April 2008, however it appears that the way in which this is used is high level using working groups etc and applies to CAA internal procedures, whereas individual operators can and do address adverse trends often quicker and financially more efficiently.	The suggestions referred to are addressed in the CAA response to question 3, comment 10. In the view of the CAA, informal partnerships (which do exist) must be balanced with more formal partnerships, which have the benefit of being reliant on the post and not the post-holder, are transparent to the public and other industry members, and are properly documented and auditable. However, they are not relevant to this consultation.
11	yes	Yes due to the way the company will view any potential release of information to the public.	Please see the response to Q2a Comment 1.
12	yes	Yes, as currently proposed this change would adversely affect the business of our airline being the only significant UK operator of the two types of aircraft we utilise. We will undoubtedly be the focus of press attention as a result of our honest and open safety culture.	Please see the response to Q2a Comment 1.
13	yes	It is assessed that there may be an impact on the specific business of [our company] by publication of the narrative detail shown in Attachment 2 as, despite the dis-identification of the operating company, the aircraft type detail effectively identifies the company. Where a common aircraft type is operated by a variety of companies within the UK this identification will not be easily apparent but any company uniquely operating an aircraft type will not remain anonymous. The publication of event details, however brief, in a public forum under a CAA assessment of serious event without informed comment is likely to lead to the formation of unsubstantiated opinion within [our company's] potential customer base. Either the general public or the media are likely to form their own interpretation of the narrative events, which may be far removed from the professional assessment recorded within the company's regulated SMS. In addition, the publication of aircraft type, location and date would potentially allow determination of a	Please see the response to Q2a Comment 1.

		particular operating crew. The knowledge that this information may be visible in the public domain could lead to a reduction in the open reporting culture currently seen amongst UK airlines and [our company] in particular.	
14	yes	Serious events in aviation are always publicised by the media and data can always be used to promote a specific viewpoint, not always providing an holistic perspective. Access to safety data in this format may provide opportunities to present the data in such a way as to be detrimental to a particular sector of the aviation industry, e.g. there have been 5 times more serious events involving a/c manufacturer X than a/c manufacturer Y, regardless of the fact that company X supply 10 times more a/c than company Y.	Please see the response to Q2a Comment 1.
15	yes	YES, the Air Safety Group (ASG) is an independent, voluntary organisation whose aim is to promote safety in commercial aviation operations. The ASG, through its membership, used to have, but will in the future, for some reason, be denied access to the more detailed MOR Occurrence Lists. Having such a summary of serious events may help the Group to some extent to discern trends of interest to the Group, but this is unlikely to compensate for the loss of the MOR data.	Access to the identified monthly MOR listings is a completely separate process from the proposal to publish Safety Performance Indicators. There is no intention to withdraw all access to MOR data, only to restrict access to <u>identifiable</u> information to only those organisations that contribute to the MOR scheme.
16	no	we already publish (via our members' magazine and web site) our own statistics, including fatality rates. The proposal will have no affect as we fall in the 'other' category and so will be anonymous.	We do not propose to publish paraglider and hang-glider data within the 'other' category, but would like to be able to publish a link to the BHPA website.
17	yes	The publication of SPIs by CAA would generate the need for analogous Key performance indicators in the company. In order to be as pro-active as possible, NATS would require prior notification of an incident being deemed to be a "serious event". This would be needed to enable appropriate corporate communications and to ensure that our safety action plans are appropriate.	Since the CAA has decided not to publish the list of serious events, there will no longer be a resultant impact for companies' corporate communications. MORS are graded based on the entire event, so it may be that a serious event involves a particular organisation but that it's contribution was positive or of no consequence. Any events of particular concern would be discussed with the company through the usual regulatory oversight procedures.

18	no	no comment.	None.
19	yes	nil.	None.

**Any other comments**

Commenter	Comment	CAA Response
1	nil.	None.
2	nil.	None.
3	Notwithstanding that this data could be revealed under the FOIA it should not be made freely available on the internet due to the damage that it could do in public internet forums to both business and the safety culture that currently exists within the UK aviation industry.	Please see the response to Q2a Comment 1.
4	nil.	None.
5	In general, we support this proposal, subject to CAA taking whatever actions are possible to address the threat of misuse of the data as discussed above.	Please see the response to Q2a Comment 1.
6	nil.	None.
7	nil.	None.
8	none.	None.
9	nil.	None.

10	This is an excellent initiative, which is ahead of EASA, the work of ECAST is setting off on this track. Having attended some ECAST working group meetings I know the CAA has influence, but do they have sufficient?	The CAA attends ECAST regularly and was a member of the ECAST group to develop a methodology for prioritisation of safety initiatives using occurrence data. The CAA is also a member of the EASA European SPI consultative team (ESPICT).
11	-	None.
12	The balance must indeed be struck between providing informative safety data, and protecting the confidentiality of the MOR scheme. The proposals at present discriminate against several airlines who operate unique types in the UK. One key step would be to adopt the unidentified aircraft type in line with the previous CAA Monthly MOR listing consultation proposals. In addition, we would ask that the CAA take this opportunity to also examine how it deals with Freedom of Information Act requests for MOR data, the nature of such replies and how it keep operators with information in such FOIA requests appraised of CAA responses.	Please see the response to Q2a Comment 1. The CAA would be most willing to discuss any concerns the commenter has regarding requests made under the Freedom of Information Act.
13	see also letter	None.
14	It is hoped that the publication of safety data can be actively managed to promote the positive efforts of the UK aviation industry in maintaining and improving safety. The need to restrict the data in some areas is understood and appreciated but there ought to be a concerted effort to use this as an opportunity to highlight the positives wherever possible by supplying supporting information such as comparative data from other parts of the world and highlight any improving trends wherever possible.	Directly comparative data is not available, however information regarding fatal accidents is available and is planned to be published along with the SPIs.
15	This would be a welcome additional service to the general public, but the ASG regrets the decision to deny its access to the more detailed data which the Group has successfully used in its past deliberations. As far as the ASG is aware, there has been no leakage of any confidential data from the ASG as a result of its discussions over the last decade or more.	There is no inference that there has been a breach of confidentiality by those organisations that are no longer eligible to receive the identified monthly MOR listings. Wherever access to identified data has been withdrawn, an alternative MOR data service has been offered. This can be subject to a charge, in accordance with Regulation 9 of the Civil Aviation Authority Regulations 1991. Any decisions regarding access to the monthly MOR listings are unrelated to the publication of Safety Performance Indicators.

<p><b>16</b></p>	<p>The BHPA has its own reporting system and method of publicising accident and safety information. The proposal will be of no use to us. If it is the intention to include us as described in the proposal then the following should be considered; How will the CAA gather the data? The data does not exist in a format that matches that in the SPIs. "Conventional" aviation's data is on a basis of "an event per million flights/hours flown". We have no means of recording hours flown or flights undertaken. How will the CAA compile such data? 75% (guestimate) of paramotor pilots are not members of an organisation and do not report incidents. Who will pay for any costs in gathering data? We believe our current system to be adequate and see no benefit in being added to the CAA stats, even in the unlikely event that a way was found to make the data compatible.</p>	<p>The CAA agrees that the costs outweigh the benefits and are not compatible with the nature of paraglider and hang glider use as a sport activity.</p>
<p><b>17</b></p>	<p>NATS would also wish to be able to view the "narrative" of the events, prior to publication, to assist in factual accuracy.</p>	<p>The narrative will not be published.</p>
<p><b>18</b></p>	<p>The AAIB agree that the graphical presentations for SPI 1,2,3,4 are clear and informative. However, the AAIB have considerable concerns over the release of information contained in attachment 2 to the Letter of Consultation - ie Generic Examples of Serious Events. The AAIB provide the CAA with preliminary data, recorded on AAIB Form F16, obtained during the initial phases of an aircraft accident of serious incident notification. Historically, this data, recorded within the first few hours of an event, has often been shown to be incomplete and inaccurate. Data concerning the aircraft type, Flight Phase, Location and date of Occurrence are quickly verified however data relating to the event itself can remain unsubstantiated for several days. The AAIB do not have in place a process of updating F16 data from that initially supplied to the CAA. This inaccurate data can remain uncorrected until publication of the final AAIB report many months later. The use of such data therefore courts the risk of publishing inaccurate and unsubstantiated information into the public domain.</p>	<p>Please see the response to Q2a Comment 1. Should the AAIB wish to supplement the F16 form with a procedure for updating information, the CAA would be most willing to assist.</p>