UK Civil Aviation Authority

CAA Summary and Response to Independent review of roles and responsibilities for safety management at UK civil flying displays

CAP 3320

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Introduction

1. Flying displays are an established part of the United Kingdom's aviation heritage and events sector. Like many major events, flying displays feature multi-agency involvement, and the understanding of accountabilities and efficacy of multi-agency coordination and delivery is fundamental to the success and safety of flying displays. From a flying display perspective, the stakeholders and agencies include aviation professionals, event organisers, local authorities, emergency services and other parties working to deliver safe and successful events. However, display flying does carry risks, and, like other similar events, the safe delivery of flying displays depends upon all agencies and parties involved understanding and fulfilling their responsibilities and accountabilities to manage those risks effectively.

2. As part of a process of continuous improvement adopted by the Civil Aviation Authority (CAA) for managing UK civil flying display safety, we determined that in addition to periodically examining our own role, there would be benefit in reviewing the interaction of all parties responsible for planning and managing public safety at flying display events.

3. We recognise that at most UK flying display events, separate to the role of the CAA, the flying display director (FDD) and participating pilots, organisation of the event itself will also involve those individuals and agencies with responsibility for managing wider public safety controls, including the event organiser (EO), the local authority, emergency services and the Health and Safety Executive (HSE). Collectively, and with due respect to the decision-making authority of all agencies, consideration should be afforded to wider event planning, so that the public are reassured that broader public safety risk mitigations and controls provide effective outcomes.

4. This independent review, undertaken by aviation safety specialist Astral Aviation Consulting, is intended to support the continued improvement of flying display safety by ensuring that responsibilities and accountabilities are clearly defined, oversight arrangements remain effective, and lessons identified from previous events continue to inform the management of risk both now and in the future.

5. A key objective of the review was to evaluate the effectiveness of the wider safety management system, understand how governance arrangements could be further strengthened, and ensure that they remain proportionate, effective, and clearly understood by all organisations involved in the delivery of flying display events.

6. Alongside making detailed recommendations to the CAA, the review concludes that the regulatory framework for the oversight and governance of display pilots and FDDs is appropriate in its current form, and that the greatest opportunities for improvement lie not in additional regulation, but in enhancing consistency, clarifying roles and responsibilities in air display management, strengthening governance arrangements and improving guidance.

7. This CAP provides a summary of the CAA's response to the Review's recommendations, which have been developed in the context of wider national initiatives aimed at improving the consistency and effectiveness of event safety management arrangements across the UK. The Action Plan aligns with the National Guidance Framework for Safety Advisory Groups (SAGs), which is being developed by the UK Resilience Academy (UKRA) on behalf of the Cabinet Office. The Framework is intended to establish a consistent national approach to SAG governance and operation and is expected to be published alongside the Report of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS): An inspection of the police's role in safety advisory groups: planning for major public events.

Chapter 1
Summary of findings

1.1 The CAA has considered the output of the review and presents a summary of key findings as follows.

1.2 **The existing CAA regulatory framework is fundamentally sound:** The ASTRAL review found that the regulatory framework for civil flying displays provides a sound foundation for the safe conduct of events. The framework has been strengthened through significant improvements over the past decade and refined through both internal and external reviews. The CAA's governance and oversight arrangements, including competence and recency requirements for display pilots and Flying Display Directors (FDDs), are mature, well understood and effective. The review found no evidence that fundamental changes to the existing regulatory framework are required

1.3 **Safety advisory groups (SAG) provide significant value:** There was strong evidence that safety advisory groups (SAGs) make a valuable contribution to public safety planning. Their principal strength lies in bringing together organisations with differing responsibilities, enabling the sharing of information, coordination of emergency planning, identification and mitigation of risks, and development of a shared understanding of safety objectives. This collaborative approach is particularly beneficial for larger and more complex events.

1.4 **SAG roles, responsibilities and advisory boundaries are not always clearly understood:** A recurring theme throughout the review was the need for greater clarity regarding the role of SAGs and the distinction between advisory input, organisational accountability and decision-making authority. Although legal responsibilities are clearly established, stakeholders do not always share a common understanding of the respective responsibilities of EOs, FDDs and SAGs. Uncertainty was also identified regarding the extent to which engagement with SAGs is expected through the flying display application process and the application of CAP 403 guidance.

1.5 **SAG performance varies across the UK:** The effectiveness arrangements for SAGs vary across the United Kingdom. Differences in local governance arrangements, organisational capability, stakeholder engagement and supporting guidance result in inconsistent approaches to planning, coordination and decision-making. While organisations generally demonstrate a sound understanding of their own responsibilities, there is less consistency in understanding the roles, authority and expectations of partner organisations. This can create uncertainty regarding accountability and reduce the effectiveness of collaborative planning processes.

1.6 **Improvement in the management of SAGs:**

- Aviation expertise: Safety advisory groups often rely heavily on FDDs for aviation-specific advice, creating variability in understanding and challenge.
- Guidance remains fragmented: Inconsistent guidance material issued by national and local agencies which is available to SAGs can lead to different interpretation and inconsistent application at different events.
- Governance is often dependent on individuals: The effectiveness of many SAGs relies heavily on the experience, continuity and commitment of key individuals rather than consistently applied governance processes.

1.7 **Improvement should focus on clarity and consistency rather than additional regulation:** The greatest benefits to air display safety management are likely to arise from clearer guidance, stronger governance processes and improved stakeholder understanding rather than new regulatory requirements.

1.8 **Learning and continuous improvement should be strengthened:** The most effective organisations are those that routinely review performance, capture lessons identified and apply improvements to future events.

1.9 **Challenges are not unique to flying displays:** The review identified that many of these challenges are not unique to flying displays. Similar issues relating to governance, advisory boundaries, organisational learning and stakeholder coordination are evident across other sectors responsible for the planning and delivery of major public events. The most effective arrangements are characterised by clearly defined responsibilities, proportionate governance, effective communication, strong inter-organisational relationships and an established culture of learning and continuous improvement.

Chapter 2

Review recommendations

2.1 The independent review of the roles and responsibilities for safety management at UK civil flying displays recommended:

- Development of clearer national guidance describing the roles and responsibilities of all organisations involved in flying display safety management.
- Introduction of proportionate and consistent governance arrangements for SAGs.
- Greater clarity regarding the respective responsibilities of FDDs, event organisers and safety advisory groups, including clearer articulation of advisory boundaries and engagement expectations.
- Improved induction, guidance and support for individuals involved in aviation-related SAG activities.
- Stronger mechanisms for sharing good practice, lessons identified and organisational learning across the sector.
- Revision of relevant CAA guidance and processes to improve transparency, consistency and stakeholder understanding.

CAA response

2.2 The CAA has devised an Action Plan in response to the Review's recommendations. This has been developed in the context of wider national work to improve the consistency and effectiveness of SAGs across the UK. It aligns with the National Guidance Framework for Safety Advisory Groups being developed by the UK Resilience Academy (UKRA) on behalf of the Cabinet Office. The Framework is intended to establish a consistent national approach to SAG governance and operation and is expected to be published alongside the findings of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) report.

2.3 Recognising that many of the findings identified by the Astral Review are not unique to flying displays or fall under the CAA's remit, we have sought to focus our Action Plan on those areas where the CAA can help deliver improvements. This will be achieved through clearer guidance, enhanced stakeholder understanding, greater consistency in governance arrangements and strengthened engagement processes, rather than through the introduction of additional regulatory requirements.

ASTRAL recommendation	CAA response
Enhance national SAG guidance	Supports the recommendation. The CAA recognises the value of a consistent national approach to SAGs. The forthcoming UKRA National Guidance Framework is expected to provide a common framework for roles, responsibilities and good practice, supporting collaboration between local authorities, emergency services, event organisers and other stakeholders involved in public safety planning.
Introduce standard aviation induction training for SAG members	Partially supports the recommendation. Given the diversity of flying display events and the varying composition of SAGs across the UK, a standardised aviation induction package for all SAG participants would be difficult to implement proportionately. However, the CAA will review guidance on FDD engagement with SAGs and require FDDs to provide an appropriate briefing on the aviation aspects of the event to support informed discussion and decision-making.
Scale SAG engagement proportionately	Supports the recommendation. The CAA supports a proportionate, risk-based approach to SAG involvement. This aligns with the principles contained within the forthcoming UKRA National Guidance Framework, which promotes collaboration, transparency, proportionality, accountability, evidence-based decision-making and early engagement with event organisers.
Standardise SAG Terms of Reference	Supports the recommendation. The CAA supports the development of more consistent Terms of Reference for SAGs. The forthcoming UKRA Framework is expected to provide greater clarity regarding the purpose, scope, roles and advisory functions of SAGs, whilst maintaining appropriate local flexibility.
Measure SAG process quality, not just outcomes	Supports the recommendation in principle. The CAA recognises that effective governance should be assessed by the quality of planning, coordination, challenge and learning, rather than solely by the absence of incidents. As part of post-

	event feedback processes, the CAA will explore opportunities to incorporate a structured review framework that captures observations on governance effectiveness, multi-agency coordination and lessons identified.
Revise the CAA Flying Display application process	Accepts the recommendation. The CAA will review CAP 403 and associated flying display application requirements to provide greater clarity regarding engagement with local authorities, emergency services and SAGs. The CAA will also engage with the Events Industry Forum and the British Air Display Association to review the Air Displays chapter of the Purple Guide and ensure associated guidance remains practical, proportionate and aligned with current operating practices.

ANNEX A

Abbreviations

AAIB	Air Accidents Investigation Branch
ANO	Air Navigation Order 2016
BADA	British Air Display Association
CAA	Civil Aviation Authority
CAP	Civil Aviation Publication
DPE	Display Pilot Evaluator
EMPs	Emergency Management Plans
EIF	Events Industry Forum
EOs	Event Organisers
FDDs	Flying Display Directors
HSWA	Health and Safety at Work Act 1974
HFACS	Human Factors Analysis and Classification System
HSE	Health and Safety Executive
NAA	National Aviation Authority
RRPs	Regional Resilience Partnerships
SAGs	Safety Advisory Groups
SGSA	Safety and Security Specialist Advisor
TOR	Terms of Reference
UKCMA	United Kingdom Crowd Management Association
UKRA	UK Resilience Academy

ANNEX B

Terminology and definitions

Term	Definition
Air Accidents Investigation Branch	Investigates civil aircraft accidents and serious incidents within the UK, with the purpose to improve aviation safety by determining the circumstances and causes of air accidents and serious incidents and promoting action to prevent reoccurrence.
Air Navigation Order	A secondary legislation, mainly applicable to the operation of non-Part 21 aircraft.
Basic Regulation	Assimilated legislation used in the UK to govern civil aviation safety, airworthiness, air traffic services, and flight operations.
British Air Display Association	The UK's professional body for the air display community. It promotes safety, standards, best practice and collaboration among those involved in organising and participating in air displays.
Civil Aviation Authority	The independent public corporation and statutory regulator for United Kingdom aviation.
Display pilot evaluator	An appropriately authorised individual who conducts assessments and evaluations of display pilots on behalf of the CAA to support the granting and maintenance of Pilot Display Authorisations and the safe conduct of flying displays.
Emergency Management Plans	A documented plan that sets out how organisations will prepare for, respond to, coordinate and recover from an emergency or major incident. It defines roles, responsibilities, communication arrangements and procedures to help protect people, property and the environment.
Events Industry Forum	A UK industry body that brings together event-sector organisations, regulators and enforcement agencies to promote good practice and improve the safe management of outdoor events.

Event Organisers	The person or organisation responsible for the overall planning, management and delivery of an event, including ensuring that appropriate arrangements are in place for safety, emergency planning, stakeholder coordination and event operations. While the EO is responsible for the event as a whole, the Flying Display Director is responsible for the safe conduct of the flying display itself.
Flying Display Directors	The individual responsible for the organisation, management and safe conduct of a flying display. An FDD must obtain the necessary permission from the Civil Aviation Authority (CAA) and ensure that the flying display is conducted in accordance with applicable safety requirements and permission conditions.
Health and Safety at Work Act 1974	The primary piece of health and safety legislation in Great Britain. It places duties on employers, organisations and individuals to protect the health, safety and welfare of employees and others who may be affected by their activities.
His Majesty's Inspectorate of Constabulary and Fire & Rescue Services	An independent public body that inspects, monitors and reports on the effectiveness and efficiency of police forces and fire and rescue services in England and Wales. It publishes findings and recommendations to support improvement and enhance public safety.
Human Factors Analysis and Classification System	A structured framework used to identify and analyse the human, organisational and systemic factors that contribute to accidents, incidents and safety events. It helps investigators understand not only what happened, but also why it happened.
Health and Safety Executive	Britain's national regulator for workplace health and safety, responsible for promoting and enforcing health and safety legislation and providing guidance on the management of risks to workers and the public.
National Aviation Authority	The government body responsible for regulating and overseeing civil aviation within a country, including aviation safety, airworthiness, pilot

	licensing and operational standards. In the UK, the National Aviation Authority is the Civil Aviation Authority (CAA).
Regional Resilience Partnerships	Regional groups of emergency services, local authorities, and other key organisations that work together to plan for, manage, and recover from major emergencies.
Safety Advisory Groups	SAGs are multi-agency advisory forums used by local authorities to support the planning and safe delivery of a range of public events from town fairs and festivals to flying displays. In the flying display context, SAGs should interface with Event Organisers (EOs) to provide advice from local authorities, emergency services, and other agencies, but remain focused on the ground events and possible emergencies, not the flying display itself.
Safety and Security Specialist Advisor	An expert who advises event organisers, local authorities, and Safety Advisory Groups on managing safety, security, crowd risks, and emergency planning at events.
Terms of Reference	A document that defines the purpose, scope, objectives, responsibilities, and expected outputs of a review, project, investigation, or working group, providing the framework within which the work is conducted.
United Kingdom Crowd Management Association	A professional membership organisation that promotes good practice, professional standards, and collaboration in crowd management and public safety across the UK events, venues, and leisure sectors.
UK Resilience Academy	A national resilience learning and development organisation that provides training, education, and professional development to support effective emergency preparedness, response, recovery, and resilience across the UK.