1. Introduction

1.1 In June 2013, the DfT’s representative, Tamara Goodwin, updated the GATCOM Steering Group on the principles and key aims of the DfT’s review of the Guidelines for Airport Consultative Committees (ACCs). At that time the Steering Group emphasised the need to keep the guidance flexible, proportionate and non-prescriptive and that the guidance should be a collection of principles and good practice. The Steering Group also highlighted that there was a need for some guidance on the role of ACCs in the process of considering airport expansion plans, particularly in respect of the Airports Commission’s work, so as to ensure that mutual respect of the differing and opposing views between interests represented on committees is maintained enabling ACCs to continue to operate effectively. In addition it was acknowledged that effectiveness of ACCs was also dependent on the right level of expertise of its members, a well-informed membership and adequate resources for expert advice and secretariat services.

1.2 Since that time, the Secretariat, in consultation with the Chairman, Vice-Chairman and the Chairman of PAG, completed a questionnaire prepared by the DfT seeking information about the current organisation and working arrangements of ACCs across the UK to assist the DfT in its review of the Guidelines.

1.3 On 4 December 2013, the DfT issued to interested parties the draft of the reviewed guidelines together with a covering note highlighting the key changes to support and enhance the effectiveness of ACCs. The DfT is seeking comments on the draft Guidelines by 14 February 2014.

1.4 A copy of the documentation was circulated to all GATCOM and Passenger Advisory Group members for comment on 4 December. The GATCOM Steering Group took into account views received from members and gave initial consideration to the form of GATCOM’s response to the consultation.

2. Draft Reviewed Guidelines

2.1 The DfT last updated the guidelines in 2003. The Guidelines are intended to:

- assist those involved in establishing, running and participating in ACCs
- be applicable to all aerodromes with a consultation process, not only those designated under section 35 of the Civil Aviation Act 1982.
- be non-statutory
- help committees operate in an effective and constructive way

2.2 The DfT’s aim is to continue to ensure constructive engagement at the local level while supporting and enhancing the effectiveness of ACCs.

2.3 The key changes are the inclusion of:

- a set of five principles - independent, representative, knowledgeable, transparent and constructive - that all ACCs can use as a common basis.

\[1\] Draft reviewed guidelines and DfT’s covering note issued on 4 December 2013
• a Code of Conduct for committee members – to be used and adapted by ACCs to help members understand what is expected of them, especially when joining the committee for the first time. The suggested Code of Conduct is set out in Appendix 1.

• greater sharing of best practice and knowledge - on an informal and ad hoc basis by attending other ACC meetings or working with other ACCs on issues of common interest as well as working with other organisations on certain issues such as the CAA and local authorities.

2.4 The DfT recognises that ACCs vary widely in size and scope and that what is appropriate at one airport/aerodrome may not be appropriate at another. However it believes all ACCs, whether designated or non-designated, at a small or large airport/aerodrome, have a common role and purpose.

2.5 In respect of other changes, the layout of the guidelines has changed from the 2003 version. It is now divided into four chapters covering the basics of ACCs (background, role and the purposes of consultation), the principles, effective meetings and best practice and knowledge sharing. The text has been updated and added to where relevant. The main omission is a section on complaints as the DfT believes that ACCs are not dispute resolution forums, so although at their best ACCs can play a constructive role in facilitating understanding and resolving issues, complaints should as a matter of course be handled by the airport.

2.6 A number of questions have been posed in the documentation which have been addressed in the suggested response set out in Appendix 2. The DfT has also invited ACCs to offer case studies of best practice for possible inclusion in the final guidelines.

3. Comments on the Reviewed Guidelines

3.1 One of the objectives of the Government’s Aviation Policy Framework is to strengthen and streamline the way in which the aviation industry and local stakeholders work together. As part of this the DfT committed to review the Guidelines for ACCs with the aim of supporting and enhancing their work and sharing best practice. GATCOM has always advocated the need to ensure that the Guidelines remain non-prescriptive and flexible. It is therefore welcome news that the DfT has reaffirmed its desire to ensure this and that it does not wish to upset the existing good governance and working arrangements.

3.2 The Secretariat circulated the draft Guidelines to all members for consideration and comment. A few comments have been received which were reported and considered by the GATCOM Steering Group at its meeting on 9 January 2014. Members will be pleased to learn that in respect of the current working arrangements and operation of GATCOM, members had positive views and felt that the Committee already operated in the way proposed in the draft Guidelines. There was therefore general support for the inclusion of the proposed principles and code of conduct for members as well as the principle of sharing best practice and knowledge.

3.3 The Steering Group considered a number of points in relation to:
• the absence of focus on the passenger interest
• the need for clarification on the categories from where membership should be drawn – what constitutes “users” and “community groups”
• further guidance on membership criteria
• regular and consistent non-attendance of members
• the need for GATCOM to offer case studies for possible inclusion in the final guidelines

3.4 All these points have been incorporated into the suggested response set out in Appendix 2. GATCOM is asked to consider and agree its response to the consultation.

RECOMMENDED

That, subject the inclusion of comments raised at the meeting, the response set out in Appendix 2 be agreed and submitted to the DfT for consideration.

PAULA STREET
Secretariat
DFT’S PROPOSED CODE OF CONDUCT FOR MEMBERS

Respect: Committee members should treat each other with respect and courtesy at all times.

Commitment: Committee members should dedicate sufficient time to prepare for and attend meetings, including seeking advice and views from others in their organisation where appropriate.

Conflicts of Interest: Members should identify and declare any conflicts of interest (actual, potential or perceived), particularly where members do not represent an organisation.

Participation: Members should participate fully in meetings. They should listen to what others have to say and keep an open mind while contributing constructively to discussions. Actions assigned to members should be fulfilled in a timely manner and progress reported back on at the next meeting.

Openness and Accountability: Members should be open and accountable to each other and the organisations and communities they represent about their work on the committee.
SUGGESTED RESPONSE TO DFT CONSULTATION ON DRAFT GUIDELINES FOR AIRPORT CONSULTATIVE COMMITTEES

Thank you for providing GATCOM with the opportunity to comment on the draft updated guidelines. Overall, the Committee welcomed the fact that the updated guidelines remain non-prescriptive and flexible and that the DfT does not wish to upset the existing good governance and working arrangements. Members felt that the new layout of the document was clear and the additional areas of guidance were in keeping with GATCOM's current practices and working arrangements.

A number of our members have highlighted the absence in both the guidelines and the DfT’s covering note of the passenger experience and the ACC’s role in protecting and enhancing facilities for passengers. The passenger experience is fundamental to the operation of larger airports and it is felt this must be taken on board by ACCs and as such included in the new guidelines where possible.

There are a few comments the Committee would like to offer in response to the questions posed in the consultation documentation and these are set out below:

Q1. Do you agree the principles described in Chapter 2 provide a common basis for all consultative committees to work to? Are there any additions or alternatives that should be considered?
GATCOM very much supports the DfT’s proposed principles as drafted as they will provide a common basis for all ACCs to work to.

Q2. Do you agree that a Code of Conduct would be a useful way to ensure members participate constructively in the work and discussions of the committee? Does the draft Code adequately reflect what should be expected of committee members?
GATCOM supports the proposed Code of Conduct for members as it reflects what is expected of members. The Code of Conduct will also help to ensure that when ACCs consider sensitive or contentious issues, such as airport expansion plans, that mutual respect of the differing and opposing views between interests is maintained enabling the ACC to continue to operate effectively. The only issue which the DfT may wish to consider further is the question of consistent/regular non-attendance of members/their organisation as part of members’ expected commitment to the work of the committee.

Q3. Can you suggest some ways in which best practice can be best shared between committees? Do you agree that committees are well placed to work with other organisations on areas of common interest?
GATCOM is a member of the Liaison Group of UK Airport Consultative Committees (UKACCs) and finds this a useful forum for exchange of ideas, views and knowledge. There is possibly a greater role for UKACCs but the DfT needs to give consideration as to how this Group is resourced and funded. There is currently good sharing of information across UKACCs and its Annual Meeting in particular enables those ACCs of the UK’s largest airports to share common issues and best practice.

It is recognised however that those smaller airports/aerodromes that do not qualify for membership of UKACCs do not currently have a mechanism to share best practice/knowledge. It is suggested therefore that the DfT consider whether there may be scope to develop a “buddy” scheme whereby the better resourced ACCs of larger airports mentor or provide support to other ACCs.

As regards working with other organisations, GATCOM advocates the importance of engaging with other key stakeholders and organisations not represented on the Committee. GATCOM has always, wherever this has been possible, communicated/discussed issues with a range of stakeholders including the CAA, local authorities and transport providers. Providing greater encouragement in the guidelines to embrace collaborative working is fully endorsed. An organisation that would benefit from greater prominence in the guidelines is the CAA’s...
Consumer Panel and how the DfT sees ACCs working with the Panel. Also, if it is decided by the Government to take forward the recommendation of the Airports Commission to establish an Independent Aviation Noise Authority, it would be helpful if reference could be made as to how the DfT expects ACCs to work with that new authority.

Q4. Do you feel the layout of the document is user friendly and easy to understand? Are there any areas of the text you think need clarifying?

GATCOM favours the new layout of the guidelines and structure of the chapters. However, there are a few areas where the guidelines could provide further clarification to assist ACCs.

Principles for ACCs
The issue of who is expected to have representation on an ACC is an important, and in some cases, sensitive matter. GATCOM often receives requests for membership from a wide range of organisations, especially from non-member local authorities and local residents’ groups close to and further afield from the airport. It is important therefore that the guidelines offer as much guidance as possible on how organisations from the three “statutory” categories identified in Section 35 of the Civil Aviation Act should be considered for possible representation on an ACC given the need to keep ACCs of a manageable size with a good balance of interests.

It is important for ACCs to guard against pressure for membership from “single issue” groups which could upset the existing balance of interests and good working arrangements. Whilst the importance of ensuring engagement with local community interest groups is recognised and very much supported in terms of the ACC’s role in disseminating information and views, GATCOM asks that greater clarification is given for this category and how ACCs should determine requests or develop criteria for membership bearing in mind the need to keep the size of committees manageable and balanced.

In addition and as mentioned above, GATCOM is concerned about the absence in both the guidelines and covering note of the passenger experience and an ACC’s role in protecting and enhancing facilities for passengers. The passenger experience is fundamental to the operation of an airport and it is felt this must be taken on board by ACCs of larger airports.

GATCOM therefore asks that the DfT considers providing greater clarification on:
- what is termed as “user of an aerodrome” – GATCOM views this as passengers, airlines and their handling agents, airport businesses, employees;
- what is termed as “organisations representing the interests of persons concerned within the locality . . .” – GATCOM views this as the local business community, environmental and amenity groups, tourism interests.

In respect of the latter category, the guidelines refer in a number of instances to community/residents’ associations. There is no mention of the business/tourism interests in the guidelines although the expectation is that ACCs should have representation from these groups (paragraph 1.9 of the draft refers). It would be helpful therefore if the reviewed guidelines were more explicit about what constituted local community representation given the wide areas of interest ACCs are expected to encompass in their membership. In the case of Gatwick, as the impact of the airport affects a wide geographic area in south east England, GATCOM encourages local residents’ groups to work with and feed their views to their elected local authority member serving on the Committee or through the environmental and amenities group representative.

Transparent
Paragraph 2.15 asks committees to consider new ways of communicating with interested parties such as through social media. While GATCOM fully supports the need to find new ways of communicating it is concerned about the use of social media given the level of resource committees have. Social media is excellent for communicating messages in a quick and efficient way but careful consideration needs to be given to managing expectations of those who use and comment via social network sites which could generate significant volumes of comments needing response.
Effective meetings and items for discussion
As mentioned above, there is a need to ensure that reference is made to the passenger interest.

GATCOM supports the inclusion of a recommended term limit for Chairmen, or the inclusion of a recommendation that requires a formal review of the Chairmanship every five years.

Complaints
It is questioned why the section on complaints has been omitted in its entirety from the guidelines. It is acknowledged that paragraph 1.10 of the draft guidelines states:

“While committees are not dispute resolution forums and they do not have any executive or decision-making power over the aerodrome, they can facilitate constructive discussion and help resolve differences while maintaining an overview of trends. They also do not prevent interested parties from raising concerns directly with the airport.”

This suggests, quite rightly, that passengers and local people/organisations can raise concerns with an ACC to help resolve differences but no guidance is offered as to how ACCs should manage that process. GATCOM values receiving letters from passengers who feel they have not received a satisfactory response to their complaint from the airport, as well as from local residents about concerns they have about the how the airport’s operation impacts on the surrounding area. These provide GATCOM with first hand experiences and an idea as to how the airport’s management is handling complaints and helps to identify trends that need to be further examined by the airport. While GATCOM does not consider individual complaints, it does consider issues and helps to identify trends. It is felt that the wording of the current guidelines remains valid and helpful (albeit in need of updating). It is suggested therefore that the DfT reconsiders the inclusion of a section on complaints.

Q5. Do you agree that Section 35 remains a useful way of ensuring different interests concerned in the operation of an airport are consulted in a fair and equal manner?
GATCOM supports the retention of Section 35 as it remains a useful way of ensuring different interests concerned in the operation of an airport are consulted in a fair manner. It also gives statutory backing to the constitution of an ACC which greatly assists committees when dealing with or trying to engage with stakeholders and other bodies on issues of common concern to member organisations. The retention of Section 35 supported by the Government guidance for ACCs will help to ensure that committees continue to operate openly and effectively.

Q6. Would it be possible to achieve these objectives in a non-statutory way - for example by the use of best practice guidance alone? Are there any areas where a statutory approach imposes unnecessary or disproportionate costs?
GATCOM believes that the objectives should not be left to a non-statutory remedy, particularly in respect of the UK’s largest airports where consultation should be viewed by all parties as a desirable consequence of operating an airport.

Case Studies
GATCOM offers the following examples of best practice for possible inclusion in the final guidelines:

How we provide benefits to the airport, to local communities and local authorities:
Seeking improvements to rail infrastructure: Recent good examples are the efforts of GATCOM, working with the airport, local authorities and the local business community, in lobbying for improvements to Gatwick Airport Station and rail services particularly the Gatwick Express service. GATCOM has also been proactive in seeking meetings with prospective bidders for the Thameslink franchise where GATCOM was able to put forward the Committee’s aspirations (developed collectively with member organisations) for the new franchise.
How we have used specialised expertise:
GATCOM appoints an independent technical adviser to provide advice and assistance on dealing with a wide range of airspace, noise and track keeping and climate change issues. A specific example is in helping to understand and comment on issues arising from the London Airspace Consultation and in guiding the Committee in commenting on the airport’s noise action plan to ensure it is fit for purpose, targeted and reasonable.

Sub-Groups
GATCOM has two sub-groups – GATCOM Steering Group and Passenger Advisory Group.

The Steering Group is composed of the Chairman and Vice-Chairman and ten other members of GATCOM reflecting the composition of interests of the main Committee. The role of the Steering Group is to give preliminary consideration to new or detailed matters to be dealt with by GATCOM and to identify the facts and major issues, and make recommendations thereon. The Steering Group also deals with urgent matters on behalf of GATCOM.

The PAG comprises 19 members, 14 of which are volunteer passenger representatives, selected by interview and appointed by Gatwick Airport Ltd. (GAL) – these members do not sit on GATCOM but are encouraged to attend GATCOM meetings to observe proceedings. The other members of PAG are the Chairman and up to 5 other members of GATCOM. The Chairman of PAG is elected from within the body of the Group.

All members have commitment and enthusiasm in helping to make the airport a seamless, user-friendly and relaxed experience for passengers. The group is made up of a cross section of regular and occasional air travellers, and all bring some knowledge of, and a genuine interest in the way airports interface with passengers. They demonstrate good communication skills, sound judgement and objectivity – all crucial to the success of the PAG’s work.

PAG members are involved in the airport’s capital project groups and other new initiative development groups to input at an early stage the passengers’ perspective. The independent volunteer passenger representatives, on appointment to GATCOM, are asked to sign confidentiality agreements with GAL to ensure that any commercially sensitive information that they are exposed to is not publicised or shared with other parties.

Examples of projects/areas where the PAG has input to GAL’s thinking/operation have included improved PRM facilities, helping to identify ways in which security/immigration queuing times can be reduced, improving customer satisfaction at security and improved children’s play areas.

Independence
GATCOM has an independent Chairman. The appointing process is agreed by the Committee - the position is advertised and the selection process involves nominated members of the committee.

GATCOM appoints an independent technical adviser.

The Secretariat is provided by West Sussex County Council.

GATCOM sets its own agenda for business working in partnership with its member organisations and the airport.

GATCOM has its own website.

Representative
GATCOM’s seeks to maintain a balanced membership ensuring that the key interest groups have representation or access to representation via an elected councillor or another membership body.

The Committee has from time to time reviewed its membership to ensure that remains balanced and fit for purpose. It also reviews annually the membership of its sub-groups to ensure an appropriate balance of interests.
GATCOM seeks to reach a common understanding between the various interests about the nature and operation of the airport so that issues can be resolved amicably. It is the custom and practice of GATCOM to ensure that all views are properly reflected and, wherever possible, to work through consensus.

An example of GATCOM representing the interests of local communities is in relation to aircraft noise - GATCOM members appointed to serve on the airport’s Noise and Track Monitoring Advisory Group have a specification for their role on that group – i.e. to represent the views of GATCOM and the wider Gatwick communities and not just the views and issues affecting their organisation or area or a single issue. GATCOM endeavours to ensure that noise issues are considered in an open and transparent way so as to help address the issue of mistrust amongst communities.

Knowledgeable
The GATCOM Secretariat issues a weekly summary of some of the news/media articles relating to the airport or key national policy changes and consultations. Members are also provided with briefing papers prior to meetings so that members come prepared to discuss topics and exchange views and knowledge. The secretariat and independent technical adviser have important roles in ensuring that members are provided with up-to-date and factual information on which the Committee can base its recommendations/advice.

The Secretariat has regular contact with members between meetings to seek views on consultations to help inform a GATCOM response and to ask members to highlight any new issues affecting local communities.

GATCOM also has a website on which all GATCOM agenda papers, minutes and background information is published providing easy access for members, and the public, to research papers.

Holds on an annual basis a new member induction session to give information and guidance about the work of the Committee and the important role of members.

Transparent
GATCOM meets in public and publishes on its website the agenda papers for meetings, key messages and outcomes and the minutes.

The Committee’s membership and terms of reference is published on the website.

GATCOM publishes the Chairman’s annual review of work of GATCOM over the year

GATCOM raises the profile of the Committee locally through the issue of a press release of key items on committee agendas

GATCOM produces a bulletin of key messages and outcomes of meetings for wide circulation to interested parties to keep them informed of the work of the committee. This is also viewed important in establishing at an early stage the committee’s role in considering certain topics/issues e.g. second runway debate.

Constructive
GATCOM is fortunate that its members have a mutual respect for individual views and as such can reach a common consensus and provide constructive feedback to the airport, the Government and other organisations.

A good example is in the Committee’s consideration of the Airports Commission’s and the airport’s management consideration of expansion plans for Gatwick. GATCOM agreed at an early stage its role in the process which is to help disseminate information to interested parties and the wider community on the process and the issues being discussed as well as assisting in building an understanding of the options being considered by the airport, the implications and impacts through constructive discussion. GATCOM also recognised that there will be differing views across the membership of the Committee and that it was essential for all interests to have
mutual respect of views expressed at meetings when exploring options and, where possible, to build a consensus on those matters/issues where the Committee can agree.

GATCOM hopes you find the above comments and examples helpful and that they can be taken into account in the final guidelines.

Yours sincerely,

Assistant Secretary