

CHIRP

Air Transport FEEDBACK

Issue No: 122

2/2017

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EDITORIAL

ATCO Fatigue.

A report from an ATCO highlighted the susceptibility of small units to manning turbulence and concern about fatigue affecting his colleagues. The unit's promulgated hours of operation are from early morning until early evening, 7 days a week. A number of staff had left during the previous year leaving it with less than half the number of qualified staff required to meet its full task. Controllers' hours are subject to SRATCOH regulations and ATCOs have a personal responsibility to ensure they do not work if suffering from fatigue. However, like most highly trained professionals, controllers are well-motivated can-do people. It is possible, particularly at small units, that controllers could feel obligated to push themselves because they don't wish to let colleagues or the unit down. Although ATCOs have a responsibility to keep their AME updated of anything that could affect the validity of their medical, fatigue is subjective and difficult to diagnose in oneself. However, small units may have an advantage in this regard because it is often easier in these environments to identify subtle changes in a colleague's performance or behaviour. It is rarely helpful for third parties to intervene unless there is an obvious issue that is not being addressed. Some ANSPs train staff to discuss matters with their colleagues if they are comfortable to do so while keeping line managers informed. In others, a buddy-buddy system looking out for each other and a professional attitude to a colleague expressing concern could provide the nudge to recognise fatigue and take the appropriate action.

Missed Approaches.

Readers may recall a CHIRP report about events that occurred during a period of high winds in the UK and a go-around that was interrupted by ATC. An extract from the report:

We had [discussed] continue the approach until the final gate, receive a wind update, if not within limits then abandon the approach. At the gate, wind was out of limits, Go-around initiated. Tower almost immediately prompted, "Straight ahead, 3000ft". The aircraft was still being configured for the missed approach. This was an unnecessary distraction with an already high workload within the flight deck. Our company policy is that we contact ATC after the aircraft has been accelerated with flaps up.

Lessons Learned: ATC should not interject so early after a go-around, unless traffic separation is a factor.

Missed approaches have been identified as the flight regime in which undesirable aircraft states are most commonly encountered and a '[Go-Around Safety Forum](#)' in 2013 identified interruptions to go-arounds as undesirable factors.

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The published Missed Approach Procedure (MAP) at the airport in the incident above is an example of a procedure likely to require ATC intervention because it requires a return to the airport overhead. It is unlikely to be flown as published on the majority of occasions because the imperative will be to intervene early to vector aircraft expeditiously into the radar pattern for another approach.

Once a MAP has been designed to ICAO criteria, individual ATCUs may add additional manoeuvres to meet local airspace requirements or to provide for contingencies such as Radio Communication Failures (RCF). It is CHIRPS' view that in many cases the utility of these contingencies is outweighed by the hazard of interrupting flight crew during a MAP when the contingency procedure is not required. If a contingency option is required it can be added as a supplement to the MAP. The MAP for RW 24 at Edinburgh provides an example of good practice. [Climb straight ahead to 3000, then continue as directed. RCF: Climb straight ahead to 3000, then turn right to NDB (L) EDN at 3000.]

Unfortunately, where MAPs and RCF procedures are compliant with the relevant regulations, the CAA is not empowered to compel ATCUs to redesign them such that, local factors permitting, they are routinely flown as published without interruption. Changing internationally agreed regulations will undoubtedly take time but more might be done to promote good practice.

We are pleased to say that the CAA agrees and has advised its Northern and Southern regional ATS Inspectors accordingly. The Inspectors have been asked to remind ATCOs of their responsibilities to keep communication to the minimum necessary during non-routine situations and to ask Operational ATC Procedure Departments to review any local RCF procedures to ensure they are still fit for purpose and comply with the required standards.

Ian Dugmore - Chief Executive

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ENGINEERING EDITORIAL

Issues reported to CHIRP are investigated in a variety of ways. Many are resolved by direct contact with the managers of the relevant Part 145 organisation, airline, airport etc. Others are forwarded after disidentification to the CAA. Some of these reports are sufficiently complex that the CAA needs to invoke its Whistleblower processes to investigate them thoroughly. In such cases CHIRP will ask reporters for their agreement to divulge their name and contact details to the CAA. If the reporters agree, they will be contacted personally by the CAA to discuss the Whistleblower investigation and CHIRP will step back from the case once the investigation is underway.

Recent feedback to CHIRP suggests there is only a limited awareness across the aviation industry of the UK CAA Whistleblowing policy and practice. Full details are available on the [CAA website](#) but extracts include:

- Anyone can make a report, but not all complaints or reports will be handled under this process e.g. a personal grievance or complaint that does not have the potential to cause harm to the general public.
- The CAA are directly responsible for investigating any information of this nature that is received. A “worker” (which definition includes employees, independent contractors, agency workers and trainees) may make a complaint to the Employment Tribunal if he or she suffers a detriment as a result of making a “protected disclosure”. An employee will be regarded as having been unfairly dismissed if the reason or principal reason for their dismissal is the making of a protected disclosure.
- The CAA will endeavour to respect the confidentiality of a Whistleblower unless agreed otherwise with them and will process any information relating to individuals in accordance with the Data Protection Act 1998 and their General Privacy Notice.
- The CAA will investigate all complaints in an appropriate manner, but in order to achieve this, the contact details for the Whistleblower will be required. Anonymous reports are accepted but are often harder to verify due to the inability to clarify details with the reporter.
- If you make a report you will:
 - receive a response to your complaint/allegation
 - be kept informed of progress with the complaint(s) if requested.
- Whether the investigation is ongoing or has been concluded can be confirmed but in most cases it is not appropriate to provide specific details of the investigation.
- Before submitting a Whistleblower report, aviation industry employees or ex-employees should have considered:
 - contacting the organisation concerned
 - following the organisation's internal complaints procedure.

This action will not prevent the CAA from exercising its regulatory responsibilities by investigating any report received.

- Employees and contracted personnel may report to the CAA via this whistleblowing process alleged infringements of the Occurrence Reporting Regulation 376/2014 as prescribed by Article 16(12) of that Regulation.

Dave Tattersall - Deputy Director Engineering

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FLIGHT DECK IPAD INSTALLATION

Report Text: On the evening of [date], [company] Engineers were made aware that a flight deck iPad installation was going to be retrofitted to our [aircraft] fleet as of [the following day] for flight deck crew charts etc., and that it is not an Engineering matter and has been implemented and installed by Flight Operations with approval by CAA.

While I appreciate the CAA have granted this approval and accept that someone else wants to take responsibility for the fitment of this, we as the turnaround engineering teams and the people signing the aircraft CRS as fit to fly, have a duty of care to raise any issues we feel cause an immediate risk to the aircraft and its ability to operate safely.

The iPad bracket is a substantial piece of material that can cause damage to the crew and aircraft if dislodged during aircraft manoeuvres or turbulence and even worse, has the possibility to become jammed between the yoke or rudder pedals. This has a high probability of happening in my opinion as it is only held on by 2 spring clips only designed to hold paperwork.

I have just been to [aircraft registration] and found that not only is the iPad lead on the FO's side clearly impeding on the crew oxygen mask but that it is even fitted back to front, so is not even operational for its intended job and shows the level at which this work is being carried out.

There is a reason we have qualified engineering staff to fit parts and equipment to our aircraft. This is not installed through any engineering authority. This is an immediate flight safety issue which needs attention ASAP.

Company Comment: On the [date], [company] entered into an operational trial period utilising the iPad Air 2 as a portable EFB solution held in situ via a viewable stowage as permitted under AMC 20-25. The trial was approved by the [company] Flight Operations Inspector after review of a comprehensive submission inclusive of an operational risk assessment. To date, the overall feedback from [company] flight crews has been positive.

[Company] understands that there were initial communication challenges, primarily within the Engineering teams, during the early stages of the deployment and has reviewed and appreciated all feedback to date. The risk log has also been updated to reflect the concerns reported.

It is hoped that the below bullet points will assist when addressing the reporters concerns.

- iPad mount (flypad tray) is specifically designed for the [aircraft type] and is in use by a pool of operators worldwide. The [company] risk assessment considers both the location of the mount and its robustness during abnormal flight scenarios.
- The iPad charging cable routing is defined by Notice to Aircrew and Flight Crews are instructed on how to correctly route the cable away from the O2 mask. In fact, the 2 metre charging cable was chosen specifically after risk assessment as mitigation to avoid the O2 mask.
- Although the equipment is 'not fitted' and therefore the installation does not need to be approved as part of the airworthiness spectrum, it was required to be approved equipment with a satisfactory means of installation on a temporary basis.

CHIRP Comment: Although it appears to be compliant with the AMC 20-25, the issue does not readily fall into any of the 3 standard categories ('carry on – carry off', 'carry on – connect' or 'fully fitted'), since the mount remains on board the aircraft but the iPad itself is carried on and connected. It is essential that flight crew comply with the fitting instructions promulgated by the Operator and for flight crew and engineers to report any problems encountered during the trial.

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SERVICE REFUSAL

Report Text: On multiple occasions whilst transiting areas in the vicinity of [] CTA/CTR a Basic or Traffic Service was requested but [] ATC refused outside the hours of 0930-1730L on each occasion claiming "LARS closed, unable to provide services". Basic Service does not require LARS. Each occasion there were multiple other aircraft on frequency also requesting and being refused service. In one case a commercial company call sign requested a reason and was told "management decision" and nothing further was said. This is an unacceptable situation particularly in a busy area for transit traffic east and west bound close to [] CTA/CTR. The whole point of ATSOCAS is that some form of flight following is available.

Lessons Learned: [] provide a service as per ATSOCAS norms.

CHIRP Comment: LARS are funded by the Department for Transport; the number of hours each day and their timing are determined by negotiation and periodic review taking into account local factors. There isn't a blanket ban on providing a service outside the LARS hours – it would depend on traffic levels. The controller's reference to a 'management decision' when asked why there was no service available was likely to have been an attempt to forestall an undesirable protracted discussion over the RTF.

The term ATSOCAS has been replaced by FIS but the provisions of the Basic and Traffic Services remain unchanged. The reporter is correct that a Basic Service could be provided outwith a LARS but a Basic Service does not comprise a flight following service. A Basic Service would be available from London Information but a better option would be to use the Unit's listening squawk and frequency. If the QNH was required by transit traffic it could probably be obtained simply by listening but it could also be requested. In the event of an emergency a Mayday call on the listening frequency would certainly attract an appropriate response and assistance from the Unit no matter what time of day.

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PRESSURE TO FLY WHEN NOT FIT

Report Text: I had a call yesterday from a manager to be informed that my absence record had resulted in me being placed in Company's absence management programme. For this to happen, I had 3 separate absences due to being medically unfit. I was told that I am not allowed to call sick for another 12 months or I will be put into a more serious level of the programme. I asked how I could be expected to defy the laws of nature and stop being human and know that I was not going to be ill for 12 months. The answer was that I had to achieve this.

This puts huge pressure on me. Despite the fact that I will protect my licence and not come to work sick, I have to live with this stress over me for 12 months. If I am sick, who knows what happens next (the manager refused to tell me). I am lucky that my pension is the old type which will not be affected if I am put into the next phase of the process, but for newer guys, there are huge financial implications of being sick. It is [wrong] of [the Company] to put this pressure on their pilots to report for work unfit and I would like to know why the CAA are letting them get away with it!?!

CHIRP Comment: It is understandable that operators wish to minimise absences from work but the obligations of licence holders to fly only when fully fit should be factored into absence management programmes. Multiple absences may require occupational health assessment to determine the cause(s) but flight crew should not be made to feel under pressure to fly when not fit.

The reporter is correct; no matter what the potential implications, pilots should only fly when they are fit to do so. If unfit to work through illness pilots should seek aeromedical advice from their AME thus ensuring the episode of illness is documented

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BAGGAGE RECONCILIATION EQUIPMENT UNSERVICEABILITY

Report Text: One of my roles as a dispatcher is to reconcile baggage loaded on aircraft. However due to the poor equipment installed at [location] airport, sometimes this task can be challenging as some [airport] management computers are broken.

1. Most Baggage systems around the ramp do not work.
2. Keyboards are broken or software frozen, this means I am unable to accurately reconcile bags.
 - a) I cannot clearly identify which bags are and are not loaded on the aircraft.
 - b) I cannot clearly identify the location of the baggage loaded on the aircraft.

Airport Authority Comment: Inevitably kit will be Out of Service from time to time, but there are robust fault reporting procedures in place and faulty equipment is generally rectified promptly. Also, all of the vMUSE™ (Multi-User System Environment – a proprietary shared passenger and flight information system) equipment sets that the boarding gate staff use to check boarding cards have a version of Baggage Reconciliation System (BRS) on them. The functionality of the BRS on the vMUSE sets was requested by the dispatchers when we developed the current BRS and it has all the details the reporter mentions. This was done so dispatchers could monitor the loading of the flight without having to go outside to use a full BRS set. The vMUSE sets are installed on every departure gate.

This is a training issue. The reporter should ask his employer for details of BRS on the vMUSE sets, or alternatively, we can show him where to find it.

Service Provider Comment: Reconciling of baggage is performed by trained staff who are re-trained every 13 months:

1. A Loading Instruction Report Form (LIRF) is provided for all flights; it is completed by the Team Leader (TL) to show that the loading distribution of the baggage loaded is consistent with the final count.
2. A visual check by the loading team (Right date/Right flight/Right destination) prior to loading baggage bulk loaded aircraft. All trailers and containers have trailer cards with the flight details and count per trailer and container.
3. A holds Manifest Declaration Form (MDF) is required for all flights, to confirm that the baggage count is reconciled against the (LIRF) this is completed by the appointed person (Dispatcher).
4. A Departure Control System (DCS) is used for the printed baggage manifest; this records all bag tag details, in-turn this data is automatically uploaded to the BRS. A 'pieces & weight' is also printed off which shows exactly how many bags have been accepted from the DCS system. If the BRS is down dispatchers can either login to another set or ring operations to confirm what has been accepted.

The BRS computer systems are managed and serviced by a contractor who has a reporting system for any defects through the "Terminal Control Hotline" or e-mail. It is the responsibility of any individual detecting a fault to report it to either Terminal Control or to operations, where it will be forwarded on to the contractor.

CHIRP Comment: We agree with the Airport Operating Authority and the Service Provider's comments. There are undoubtedly pressures that make it difficult to find time for fault reporting but it must be done and will ultimately save time. Of equal importance is that reported faults should be rectified without delay in order to avoid a backlog of unserviceable equipment that would undermine dispatchers' confidence in the fault reporting system.

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FALSIFIED TRAINING RECORDS AND WORKING OUTSIDE SCOPE OF APPROVAL AND/OR CAPABILITY

A verbal report named a number of individuals and events witnessed, with first-hand knowledge that gave grave concerns regarding individuals working outside of their scope of approval and/or capabilities. A wide ranging discussion took place regarding falsification of experience and training records of Contractors employed through contracting agencies [company names].

CHIRP Comment: The use of contracted engineers and mechanics is increasing, including the use of contractors from abroad. The majority of workers in base maintenance are not required to hold licences but would be supervised by appropriately authorized licence holders. Engineers working as contractors routinely register with several contracting agencies. However, the standard of personal log books is poor and the monitoring and verification of qualifications is difficult to control; a 'passport' system for engineers has been attempted but proved unsuccessful.

Although some employers use the contracting agencies to verify qualifications and conduct induction training, the responsibility lies with the Part 145 rated company, not the contract agency, to ensure the accuracy of training records and competency of any/all persons working under the 145's scope of approval. This should include a review of the contractor's documentation, an interview to determine their previous experience and an assessment of competence if felt necessary. If the contractor has not worked in that organisation previously then training on the company procedures, paperwork and authorisation system should be provided. In the event of doubt about an engineer's licence, employers should contact the license issuing authority.

Further advice is available in [CAA Information Notice IN-2017/015](#) entitled Part 145 – Maintenance Staff Employment Status.

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REPORTING FATIGUE TO THE COMPANY

Report Text: I offloaded myself in the middle of a long sequence of Flight Duty Periods where every day involved multiple sectors. After checking out, I filled in the fatigue report form. I then had to call crewing, who wanted me to report back the next morning to position to [] to carry on with my roster (I had been due to operate there the evening before). Crewing also wanted me to call them the next morning to let them know whether or not I was still fatigued.

I did call crewing the next morning (having set my alarm to ensure I was awake in time call them with enough notice to call a standby to cover my duty) to let them know I was still exhausted. So what do our good friends in crewing do on my roster? They put me down as SICK.

The following Sunday morning, when I was well rested, I reported to continue my roster. Before flying I [had an interview to determine the circumstances and background to my reporting fatigue]. May I say that the interview did not feel like a duty of care interview, but more an interrogation into my lifestyle?

A few days later I received an email asking me to fill in a Self-Certification form for my recent sickness. [The explanation was that my absence had been recorded] as sickness as my roster met the legal requirements when it was put through [a proprietary fatigue management application].

So, not only are the company relying on computer software to decide whether or not a flight crew member is fatigued, they have also made the whole process of reporting fatigue very long-winded. Having spoken to a number of flight crew within the company, I discover that - for the sake of simplicity - flight crew are actually reporting sick rather than going through the whole fatigue reporting process.

CHIRP Comment: Reporting sick, rather than fatigued, for convenience cannot be condoned. It is reasonable for operators to investigate the factors contributing to fatigue in order to identify the elements that are their responsibility to manage. Unfortunately, susceptibility to fatigue is dependent on individual personal characteristics and circumstances and therefore a great deal of information is required. It might be a time-consuming process but it is necessary to gather the information either by a filling in a long fatigue reporting form or subsequently by interview.

Fatigue modelling software is becoming increasingly sophisticated but should not be used as a determinant of whether a particular individual was fatigued. There needs to be a clear policy on reporting fatigue, including how and who classifies it and clear training on the use of models to support fatigue assessment. It is reasonable that the impact of the individual circumstances is considered as well but if a crew member says they were too fatigued to operate then they were and the information needs to be recorded.

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