

CHIRP Air Transport FEEDBACK

Edition 132 | 4/2019

EDITORIAL

Welcome to CHIRP Aviation FEEDBACK 132: The Air Transport Advisory Board (ATAB) hopes that you will find much of interest in this latest edition. Firstly, some lines about the ATAB; then a 'thank you' for the feedback that we, on the Board, periodically receive from our readers and finally in this Editorial an important point about CHIRP.

The ATAB has around 45 members, more than half of whom attend any given meeting. No problem with that – many members are 'alternates' for others. Around three quarters of the members are in active employment, the remaining quarter being retired following aviation careers. Such 'independents' bring extensive experience – and long, valuable memories! Every profession in the UK's aviation operational environment is represented: ATCOs, engineers, through 'medics' and military to 'unions'. The CAA always attends, welcoming the opportunity to hear discussions first-hand in addition to taking 'action items' away from the table. Both the Air Accident Investigation Branch and the UK Airprox Board are present throughout, providing up-to-date briefings on their current issues. ATAB meetings invariably begin with the reading of a Confidentiality Statement reminding everyone of the need to 'keep discussions in the room'. If you are or have been a reporter to CHIRP, you can be assured that our disidentification procedures are extremely thorough and reporter's names or identifiable details are never revealed to the Advisory Board members!

So just who does the Advisory Board advise? Well, the short answer is 'CHIRP staff who will be investigating and processing Reports'. Such Reports are tabled, substantially in the Reporter's own words, so that ATAB members can advise on action to be taken. Sometimes, the Board indicates comments that should also be published. At a future meeting, those Reports will be tabled again with, for example, the Operator's Comments and/or those from the CAA. The Board – and it is the whole Board, not just a member or two – collectively produces any CHIRP Comment based on any earlier draft. The whole is then re-circulated to ATAB members prior to publication. Thorough, I hope you will agree.

Post publication of FEEDBACK, it is the – much welcomed, thank you very much – case that a reader will contact CHIRP with feedback for us. We always take such inputs back to the ATAB for consideration, most likely publishing the reader's remarks and any response from the Board. So it is in this edition of our Newsletter.

It is important to remember that CHIRP and its Boards have no 'executive authority' to make change happen: our role is to encourage change, influencing those with that authority as best we can. This we do on the basis of reports received, the knowledge and experience of our Board members and our own investigations. There is more about this later in this Edition of FEEDBACK and in an article currently being prepared for publication in other fora to explain CHIRP's role, strengths and limitations. The aim is to assist potential reporters to help us have the greatest effect in improving safety.

Peter Hunt - Chairman, ATAB

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[COULD YOU BE THE NEW CHIRP DIRECTOR OF AVIATION? IF YOU ARE INTERESTED DON'T MISS THE ADVERTISEMENT LATER IN THIS EDITION.](#)

ENGINEERING EDITORIAL: THE NIGHT SHIFT HF ENVIRONMENT

For this edition of CHIRP FEEDBACK, I would like to feedback something that I have experienced over the years and which was also the subject of a couple of reports that I have seen over the last year that did not really go anywhere for various reasons but something worth mentioning here from the Human Factors side of things.

Companies are called upon to provide engineers with the facilities, tools, information and parts needed to do a good and safe job. And as you are aware, they are regularly audited by the regulator or by customer QA departments against these points contained within PART 145 of the regulations.

However, there is another component to this story that very rarely gets looked at in the cold light of day: Night Shift Airport Contractor Works.

These people are employed by the airport to do various infrastructure works and like everyone they want to come in and get it done as quickly and efficiently as possible. Nothing wrong with that.

My concern here is the fact that the Airport has commissioned this work with no regard for very much else apart from road closures/diversions etc. and gone home, the MRO management that has provided the above part 145 requirements has done its part and gone home. What is left is an engineer trying to focus on a sometimes complex or difficult task at a point in the night when he is feeling at a low ebb with contractors possibly turning power, water or an element of IT infrastructure off and on without warning. Not a good situation and extremely frustrating, I can state from experience. But more importantly a fertile environment for HF type issues to occur.

The issue that I want to highlight, and which was reported several months ago was, Fire Alarm Testing at an Airport in the UK.

The reporter stated;

Last night the airport authority tested the fire alarm repeatedly over a period of 4 to 5 hours making it difficult to concentrate on conducting aircraft maintenance.

The reporter complained to the Airport Duty Manager who said the alarm was not being tested continuously but only in burst of 5 minutes - therefore it is permitted. The reporter contends that this is not permitted over several hours.

This was not the first instance of this issue at this airport, my predecessor intervened several years ago because of the same issue. I have experienced the same issue at more than one UK airport whilst working nights and my colleagues would often describe it as a form of torture that could not be stopped, as the real owners were not around when it was happening and the duty managers and contractors were determined to keep going and get the job done as requested to them for that night shift.

With the above in mind, can I ask engineers not to suffer in silence if you are struggling with poor environmental conditions. Please report it to your own organisation, the airport, the CAA or to CHIRP. Can I also ask the airports to think about the impact their contractors will have on the nightshifts working the terminal or ramp areas on a nightly basis? Together let us try not to create a poor HF environment for everyone's sake, not just the engineers.

Terry Dudley - Deputy Director (Engineering)

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COMMENT ON FEEDBACK EDITION 131 - PASSENGERS BOARDING THE AIRCRAFT BEFORE THE FLIGHT CREW ARRIVE

I am a Captain with [Operator], for the last few years operating the []. Having been a military Flight Safety Officer [FSO] in my former Naval career I remain an avid advocate of all Flight Safety matters and a fan of CHIRP in particular.

I am however singularly disappointed with the response to the titled report in your recent CHIRP FEEDBACK. The feedback from the operator appears to be the extent of the investigation and that comment closes the issue. It also appears that I am not alone, the online BALPA forum is currently hosting a discussion questioning the point of submitting CHIRP reports only to find the now familiar dismissive response from the operator.... "It's approved by XYZ therefore it's fine".

From our position on the Flight Deck my colleague and I are the final arbiters of safety.... These days we are often the ONLY arbiters of safety as those colleagues around us who were trained and experienced in matters of safety have now gone, replaced by lower skilled workers. In short, there are many less slices of cheese to align than in previous times and if it gets past my colleague and I then the inconceivable will happen. We have had rules and Ops Manuals for years and yet we still have accidents. Just because the Ops Manual says it was safe once, does not mean it will remain safe for all time. What we once thought of as safe limitations, have become today's performance targets

To summarise my personal experiences of the reported occurrence:

- I often carry out trips where the cabin crew are on a different length of trip, who consequently I will not have met before report.
- Those crewmembers are often accommodated in a different hotel making the first point even more difficult to achieve.
- I arrive at the aircraft well before the cabin crew's normal engagement time to find boarding has already started.
- The passengers and their copious hand baggage are corralled in the (non air-conditioned) airbridge as boarding now takes twice as long with all the bags.
- IAW the [Ops Manual] a suitably qualified person has armed the aircraft emergency lights. There is no responsibility for environmental control.
- I fight my way to the flight deck through the passengers who are now energetically competing for overhead stowage with their promised generous cabin allowance.
- The cabin is boiling as the air conditioning is not correctly configured.....
- In the process of the above I meet in passing only two or three crewmembers who are otherwise engaged stowing baggage.
- The doors will be closed by the ground staff at STD -5 regardless of baggage or safety issues, because their financial reward is based on that performance.
- Flight preparation begins but I have no opportunity to tour the cabin and meet the crew because the passengers will not all be finally seated until after pushback (yes that's allowed now as well).

This situation used to happen once in the proverbial 'Blue Moon'. Now it is a regular occurrence.

Are we therefore to assume from this approval [in the Ops Manual] that;

- The pre-flight briefing of the crew is now entirely optional?
- It is permitted to allow access to the flight deck to someone (of the 15+) in a [] uniform who we have never met?
- No one is responsible for the environmental control on board.... A station engineer passing through between his profitable third-party work or other duties?
- Who will be carrying out the Smoke/Fumes checklist whilst a distressed APU or Pack starts coughing out noxious fumes into the cabin?
- Are we to presume a SCCM initiated evacuation will be fast enough to negate the unchecked passage of contamination into the cabin from the air-conditioning?

You might at this point wonder why this process was ever approved at all? The reality is that it was approved in another era. An era where (it was promised) it would be seldom used. An era where boarding was easy, where airlines did not incentivise passengers to bring tons of hand baggage into the cabin and airline employees were safety aware instead of worrying about whether their pay this month was going to be deflated if the doors were not closed on time.

There is so much in my working environment today that is toxic to good Flight Safety. The economic pressures and realities of the business are marching over our threshold and we are apparently powerless to stop them.

My job is to act as the final arbiter of safety, I am the guy who has to ask the difficult questions and blow the whistle to halt proceedings when things start moving in a dangerous direction. Just because something is written into the Ops Manual, just because it was once judged safe for occasional use.... Does not mean it is safe now.

Aviation today needs organisations like CHIRP more than ever before. I would urge you to explore every avenue in drilling down through the veneer to get to the core issues with incidents like this. Operators may have a stock collection of answers but we must continue to ask ALL the difficult questions and explore ALL avenues. Perhaps you might consider presenting some of these issues to the authority for comment, rather than simply the operator?

CHIRP Comment: We welcome all comments – good and bad – and we are grateful for this one. When we fall short of expectations it is quite right that we should be called out. In light of this full and persuasive comment we have referred the issue of passengers boarding before the flight crew to the CAA. We will advise our readers of developments.

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AN EXTRACT FROM A 2ND COMMENT ON FEEDBACK EDITION 131

Recently I have read CHIRP responses merely saying, "if it is in the AOC Ops Manual, then it is legal...." when clearly there is more to it than that. Things which used to be limitations are now targets for companies. We are up against limits all the time now. Something will go wrong before this regime is halted.

Sadly, I have recently seen a contributor on a forum actually suggest that CHIRP is now a waste of time because they always side with the company. I am afraid I have the same concern.

CHIRP Comment: Clearly this comment does not make comfortable reading! And we would be the first to agree that just because something is legal, it doesn't mean it's sensible. We're aware that there are frustrations with achieving changes in some areas and we share them. CHIRP endeavours to do its best to influence companies and the regulators and follows a robust process in order to respect the regulations as they currently stand whilst highlighting how they might be improved. But it is important to point out that if we are to challenge well-established procedures that will have been risk assessed by the operator and accepted by the CAA, we need evidence and/or persuasive arguments to support our challenge – as above in the case of passenger boarding.

The comments we have received about FEEDBACK Edition 131 show that there is more that we can do to explain what we do, how we raise issues for the attention of the various safety systems, and the constraints of doing so without executive authority to enact change ourselves. To that end, we will produce a short information note for wide dissemination; the aim will be to inform and reassure potential reporters that CHIRP has made progress with many of the issues reported to us, whilst also acknowledging that there remain many areas that would benefit from further review and refinement. Although progress can sometimes appear glacial, you should be confident that the opinions of CHIRP are respected by and, in many cases influential with, the various aviation stakeholders as we provide the sum of evidence that often spurs change.

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PILOTS REPORTING WHEN UNFIT

Report Text: Twice over the previous month I have operated with First Officers who had reported for work and operated whilst they were unfit. In both cases they had taken medication to suppress their symptoms so that their illness was not apparent at report, only later on the flight deck when their symptoms began to show and when they were taking their medication was it clear that neither should have been at work.

In the first case, the FO admitted to me during the cruise (outbound on intercontinental service) that he was returning from a period of sickness but still not 100% therefore was on medication to alleviate his symptoms; he said that he had already had some time off and he couldn't afford any more time off due to the loss of allowances and apologised in advance if we got his "bug". As a result, following a short layover, I succumbed to his "bug" during the cruise on the return leg, and felt that it was safer for me not to operate back into home base. This necessitated a reorganisation of the crew roles with our heavy crew on my return from the bunk.

In my opinion, incidents such as this are a direct result of how we are paid for our work. Historically we were paid a large portion of our salary in allowances, then in the recent past (approx. 5 years ago not sure?) our company moved to a pay structure whereby we were paid a fixed amount in lieu of allowances and flying pay; this in many people's opinion worked well in that pilots were not financially penalised for missing work through sickness. After a period of time (perhaps 2 years), the company concluded that sickness levels had risen and this was due to the new payment scheme; they argued and were successful in making us return to more variable allowances as part of a wage/rostering negotiation. There was considerable disagreement between our airline and the pilots as to the causes of the increased levels of sickness: Was it the case that pilots were calling in sick when they weren't? Or was it simply that pilots were calling in sick when appropriate and the data previously had been skewed due to pilots turning up "on their deathbeds" for fear of missing out on lucrative allowances? This was all conducted within the backdrop of longer working days, a change in rostering practices, more flying hours and less time off down route – optimisation I believe they call it! The bottom line is that there are many pilots with different financial pressures that they cite for turning up to work when not fit; this is particular acute in the short haul operation there are many young pilots with loans to repay and pilots desperately trying to save a deposit on a rental property or to get onto the housing ladder.

In the second case, the FO admitted, when questioned over his flu like symptoms, that he was taking a course of medication and antibiotics to ease his flu symptoms (which were not apparent at report) and to combat a chest infection but he didn't want to call in sick as he not long returned from work from a period of sickness and did not want to trigger the next stage of company's Absence Management Program. The trip length was just short of 3 days, i.e. report in the evening on day 1 and land early in the morning on day 3; on the day I got home I became very unwell which has laid me up for the best part of week, subsequently my family has also contracted flu. All could have been completely avoidable had I not been exposed to the virus myself from a work colleague.

In the 20 plus years that I have been flying there have been some really big changes that have impacted sickness at work. Initially, hours flown were manageable – since the mid-1990s they have increased by approximately 40%. The rostering process back then had a human factor that ensured not only legal rest but also a "common sense" check on what would be fatiguing, now we have computers optimising rosters whose sole purpose is to extract as much flying as possible – to the edge of fatigue. We then are given days off to recuperate – our families build us back up, then just when you are feeling "human" again you're off to work. This has resulted in increased sickness and increased take up of part time (again 20 years ago barely any pilot was part time – now they are a significant proportion). Our company Absence Management Program was brought in to combat sickness chiefly amongst the cabin crew community. It is applied to the whole workforce

and it's multi stage process within which they monitor your sickness and can ultimately result in dismissal; although I have never heard of any flight crew being dismissed many pilots (especially new ones) are fearful over the process – having to come into interviews to discuss your absence and being told “you need X (period of time) without further illness otherwise you will be in stage _”.

In my experience, the incidences of flight crew turning up to work whilst unfit have increased markedly over the past few years and this is a clear and present danger to safety.

The reasons for pilots reporting for work whilst unfit is due to number of factors, chiefly: the financial penalties of the allowance structure and intimidation by the company AMP process.

Lessons Learned:

- Stress the importance of our responsibility as licence holders to be fit at report.
- Change the allowance structure to the flat rate that we had before.
- Administer the AMP in a less draconian and more sympathetic manner.

Operator Comment: Flight Operations is obliged to manage absence within the boundaries of the corporate policy but does so recognising the nature of the flying role and the stresses that brings. We would always encourage pilots to report sick when unable to operate and contact the attendance team to discuss any concerns about the process they may have. The intent of the policy is to provide support to individuals where necessary whilst encouraging regular attendance.

Discretion exists throughout the process preventing an individual triggering a meeting under the corporate attendance management policy, keeping an individual within the current stage or holding a meeting and not progressing with an improvement plan where appropriate. Return to Work discussions provide an opportunity to check welfare and support individuals as well as discuss absence. Absence Review Interviews are held throughout the process and are key to appropriate handling and we continue to work on providing feedback and improving these conversations.

All pilots who are absent due to sickness or injury are remunerated at basic pay. Additionally, when flying, pilots receive a supplementary payment which is not payable during periods of absence. This form of remuneration has been in place for many years apart from a period of 3 years where it became a fixed monthly payment. We have no evidence to suggest that this has discouraged people from reporting unfit for duty.

More recently a new line fleet line management structure has been introduced to enable pilots to have direct contact with people managers aligned to their fleet. Pilots are encouraged to contact the fleet team for support should they have concerns regarding their own health and wellbeing in or the corporate absence manage processes. We encourage feedback and actively review to improve the application of this policy within the company.

CHIRP Comment: The problem of pilots flying when unfit is not confined to this operator. Financial pressures and/or inappropriate HR processes are cited as causal factors in many reports to CHIRP. This report provides a particularly lucid explanation of how these factors influence pilots who would in all other respects be considered utterly professional. That they are prepared to operate outside the provisions of their licences illustrates how powerful are the disincentives to reporting unfit.

Remuneration packages should reflect the reality that many pilots will incur large debts to gain their licences and to enter the housing market. They should also be part of the greater HR effort to create a culture and environment that genuinely encourages pilots to operate only when fit to do so while discouraging inappropriate absences. A one-size-fit-all HR policy is inappropriate because pilots who report sick with relatively minor conditions – which do indeed preclude flying – will inevitably trip the absence management wire. Medical advice suggests that more than four short-term absences in a year should generate referral to a medical professional. The individual can then be properly assessed before any HR absence management process is invoked. Such an enlightened approach is not widespread in aviation.

CHIRP is unaware of any data to indicate just how many flights take place with pilots who should not have reported for duty through illness. However, from anecdotal evidence and CHIRP reports we do not believe it is reported formally as often as it occurs. We are also aware that many pilots are increasingly feeling the cumulative effects of flying to the limits permitted in EASA FTLs and operators are seeing increasing numbers of pilots seeking part time work. Perhaps this has contributed to the formation of Flight Operation Liaison Group (FOLG)¹ sub-committee to investigate pilot wellbeing.

The CHIRP report above has been passed to the UK Flight Safety Committee to inform its work on developing generic attendance management protocols appropriate for managing pilots. It has also been passed to the CAA. As a result of the discussions held at the Air Transport Advisory Board, the Chief Executive of the UK Flight Safety Committee has been invited to attend the FOLG Well-being sub-group.

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¹ The FOLG is a Joint Industry/CAA Group attended by Directors of Flight Operations from the major UK airlines and the CAA.

PILOTS NOT MAKING THEIR LEVEL RESTRICTIONS

Report Text: I have been a controller for nearly 14 years and I have noticed a trend that pilots are not making their restrictions. I have submitted a report and I feel that the airlines may not be disseminating the information promptly or even at all. Someone recommended me to contact CHIRP as there are a lot of pilots that read this forum.

I would like to make pilots aware that when ATC give a 'level by' restriction, it is not only for Continuous Descent Approaches (CDAs). I appreciate that a subsequent clearance overrides the previous clearance but in most cases, I know that a subsequent clearance has not been given and the 'level by' restriction is being treated more and more like a nice thing to achieve. I know that flying into London airspace, there are what some may think of as harsh descent 'level by' restrictions. However, they are there for a reason – separation from other aircraft - and with more and more traffic flying, it is imperative that those level restrictions are met (as long as they are reasonable requests). If pilots cannot make the 'level by' then it is important ATC know about it.

Guild of Air Traffic Controller Officers (GATCO) Comment: We have also seen this as a rising trend- and not just with descending traffic - aircraft climbing on different profiles (high speed/ low rate of climb) have also caused significant problems. As the reporter states, 'level by' instructions are vitally important and ATC need to know if an aircraft is 'unable' as soon as possible.

CHIRP Comment: "Level by" restrictions are a common ATC tool to ensure aircraft are separated. The UK's airspace, particularly in the South East, leads to constraints that are not evident in less congested airspace elsewhere. There are also level restrictions that are almost 'standards', applying on virtually every occasion, yet these are not written on approach plates or publicised so that pilots would know. From the pilot perspective, it would help enormously if ATC could tell pilots in advance that a reduced speed will be required during descent. Suddenly calling for a reduction to 250Kts – e.g. due to delays into a destination – changes the descent profile which may then be problematic. It would help pilots if they could be made aware a few minutes earlier. Controllers do understand such factors but sometimes have no choice.

As with all ATC instructions, if a pilot finds they are unable to comply, they should inform ATC immediately.

CHIRP would be interested to hear from pilots on any issues with respect to how they respond to "level by" instructions. Where a perceived inability to comply is driven by company policy and not aircraft performance limitations, unless the policy forms an explicit instruction in the Operating Manual crews should comply with the restriction and inform their company afterwards.

This report and comments will be passed to Eurocontrol and to CHIRPs international partners in the International Confidential Aviation Safety Systems (ICASS) Group for publication worldwide.

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PASSENGERS SMOKING ONBOARD

Report Text: Having established ourselves in the cruise at FL350/370 the Captain and myself (First Officer) received a call from the cabin crew down at the back of the aircraft advising us that a passenger was found in the toilet smoking and another passenger (companion from the first one), trying to light up a cigarette in the toilet. The cabin crew took action by confiscating the cigarettes and advised the two passengers that what they were doing was completely forbidden in flight, against the law, risked the safety of the entire flight and that police would be waiting when the aircraft landed. The Captain then made a PA warning that smoking is completely forbidden and jeopardizes the safety of everybody on board.

Once on arrival Captain took legal action against these two passengers by completing an Offload/Prosecution Statement and another document required by the Guardia Civil. The incident was also reported to the Company by all the members of the cabin crew and the Captain, making [the Operator] aware of the situation and the risk that both passengers are in future flights

A week later the same two passengers attempted to board another [Company] flight to go back to [the UK]. [The Company] were notified that these two passengers were checked in for the flight, but the answer to this was "It's ok. They can board the plane".

Permitting these passengers to fly back to the UK sends the message that the Company does not want to take corrective action and allows them to think that what they did during the flight is fine and it doesn't put in risk the flight and the lives of those on board. This is unacceptable. We as crew did everything possible to restrain the passengers from smoking, but the airline instead leaves this be as though nothing has ever happened.

Thank you. I hope this report makes our Aviation world a little bit safer.

Operator's Policy:

- All smoking incidents are to be reported through Air Safety Reports (ASRs) and reported to the police at the destination
- Every offender will receive a written warning from the Customer Service Dept

- In the absence of any other aspects, that is the only action taken
- Second offence and more are treated similarly
- No data base of offenders is maintained per-se, but ASRs remain on file
- Persistent offender on one flight will be considered for a 'Ban'

CHIRP Comment: EASA regulations (CAT.OP.MPA.240 Smoking on board) state:

The commander shall not allow smoking on board:

- whenever considered necessary in the interest of safety;
- during refuelling and defuelling of the aircraft;
- while the aircraft is on the surface unless the operator has determined procedures to mitigate the risks during ground operations;
- outside designated smoking areas, in the aisle(s) and lavatory(ies);
- in cargo compartments and/or other areas where cargo is carried that is not stored in flame-resistant containers or covered by flame-resistant canvas; and
- in those areas of the passenger compartment where oxygen is being supplied.

Within these regulations it is the operator's responsibility to devise a smoking policy appropriate to its operations. The policy will necessarily take into account factors such as safety, commercial and cultural considerations, enforceability and legality. There is no point having a draconian policy of heavy fines or lifetime bans if they cannot be enforced. It is essential, however, that there is zero tolerance of any prohibited activity on board aircraft. In this case the crew dealt with the incident correctly and the operator has a policy that it applies consistently. The UK Flight Safety Committee has persuaded EASA to start a new safety initiative dealing with passenger awareness of safety matters for travel: smoking; excessive alcohol consumption; lithium batteries; cabin baggage in an emergency evacuation and so on. The objective is to raise passenger awareness and understanding of these issues.

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REPLACING MORs WITH INTERNAL REPORTS

Report Text: Two years ago, my company bought in an additional report called a High Workload Form. Designed to enable staff to report sessions of high workload that did not lead to a controller overload - an MOR event. The reports are submitted to the safety department but used to identify trends and are not investigated.

There was some concern that these would enable people to quietly report when they were actually overloaded on a form that would lead to lower levels of intrusion and investigation. They'd make published safety figures look great while quietly, behind the scenes a stack of papers would tell the truth about how literally 'overloaded' the system is becoming.

Recently, there have been a number of occasions that colleagues have felt the need to file an overload. But been encouraged by their management to 'downgrade' their report to a High Workload report rather than an overload. Sometimes, being told it will lead to faster rectification because of the lack of investigation.

Surely this is dangerous territory? In reality, controllers are becoming far more overloaded, far more regularly. And the safety net is not going to catch ways of preventing this if those opportunities to investigate these occurrences are actively ignored.

GATCO Comment: The High Workload forms were never designed to be used as a replacement for an overload report, and GATCO would like to stress the importance of filing an overload report if the controller feels necessary. A High Workload form is for an occasion where the controller was close to overloaded but because of an intervention it was prevented - the idea being that lessons learnt from that event would be captured (previously these events had gone unreported in any way and important lessons were missed). We suggest that the ANSP here reiterates to all staff the difference between the High Workload form and a mandatory overload report. Controllers should never be discouraged from filing an overload report if they feel it is appropriate.

CHIRP Comment: The ANSP has confirmed that the High Workload reporting process was introduced for occasions when 'overload' was inappropriate and that High Workload reports are reviewed and lessons shared. CHIRP reiterates the advice above: controllers should submit an overload report whenever they think it appropriate.

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COMMERCIAL AIRCRAFT LANDING WITH RESCUE AND FIREFIGHTING SERVICE (RFFS) LEVEL 2

Report Text: Whilst listening in to the tower frequency at [], ATC announced a degraded RFFS to Level 2. The crew of a [twin-engine airliner] acknowledged the downgrade and confirmed they were happy to continue to

land. I am not aware of the exact company procedures and their operations manual as to the minimum landing RFFS level. However, I consider it likely that it should be a minimum of level 4 or 5 so was surprised to hear the pilots content to land with only level 2 available. I was expecting the aircraft either request how long the delay would be and hold or request a divert rather than take the increased risk of landing at an airfield with degraded fire services. The aircraft continued to land whilst the airport still had RFFS level 2.

CHIRP Comment: The operator is a non-UK EASA airline. An investigation revealed that its Ops Manual requires RFFS 7 for this type of aircraft but under certain circumstances, e.g. when a reduction of RFFS occurs after an aircraft has been despatched, the aircraft may continue to land provided the RFFS is not lower than Level 5. It is not clear why the crew continued their landing several minutes after the reduction to RFFS Level 2 was announced but it seems possible that they did not assimilate the information passed by ATC during a busy approach phase. Crews must be aware of the minimum RFFS for normal circumstances and act accordingly. The report has been passed to the CAA.

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BASIC MISTAKES DUE TO BURNOUT

Report Text: Rather than a single event I felt the need to report a lapse in the general standard of my flying which I felt have been caused by mild burnout or some kind of long-term fatigue.

We have a new rostering system at [Operator] which over the last 3 months has not given me sufficient days off nor stability to maintain a healthy work life balance. I find my mental health deteriorates when I am not kept busy, but it also deteriorates when one has no roster stability and single days off between blocks of work.

In the past week or so at work I had started to make basic SOP errors which I would never normally do. None of these errors warrant their own CHIRP report or ASR but the sum of them and the cause I feel warranted a CHIRP. Additionally, I have felt tired and run down and my mental health has been suffering.

I also feel the need to say that I did not report this to the company because they would look at my roster and say that it's not fatiguing. Indeed, the last few days taken standalone might not be considered fatiguing but as a whole the last 3 months which include 2 x 21day reserve blocks definitely has contributed to long term fatigue.

I have since taken some time off to recover. Fortunately, I have a long block of leave coming up so hopefully this will help too.

CHIRP Comment: We are grateful for this honest report which highlights the insidious nature of cumulative fatigue: how do you identify the point when you should no longer operate or need to think clearly about how to recover. In addition to submitting a fatigue report, pilots in a similar position may consult their Company's Pilot Support Network if there is one or visit their GP/AME. This reporter is commended for going to his GP, who stood him down for 2 weeks, and for contacting his Company's health services.

The report also highlights the importance of operators managing fatigue in the long term and not simply the current roster period. How many operators do this?

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PASSENGER BOARDED THE AIRCRAFT BEFORE CABIN CREW HAD COMPLETED THEIR SECURITY CHECKS

Report Text: Further to a report I submitted a number of months ago along the same lines, I would like to submit this which occurred at the same location.

We were waiting at the gate while the aircraft was being 'turned round' when a passenger approached the Captain and explained that he wanted to be a pilot. The passenger was asking lots of questions and showing a lot of interest in the aircraft, the operation and company procedures. The Captain and FO were then given permission to board, the cabin crew were told to wait a further 20 minutes or so before the plane was ready (it was still being cleaned and catered at this point). The Captain proceeded to speak to a member of the ground staff and told them to board the interested passenger as they were going to take him on board.

You could see that the ground staff was unsure whether they should board him or not and looked at the SCCM for confirmation. The general feeling was that 'it's the Captain's orders, what can we do?'

Two cabin crew members and I did question the SCCM, but by this point the Captain had taken the passenger on board. I explained to the SCCM and ground staff that I had experienced the same thing previously and that the advice I received from CHIRP was that NO ONE, i.e. passengers, can board the aircraft before the crew have completed their security checks. Unfortunately, the SCCM was not prepared to act and said, "it's a grey area, what can I do...?"

The SCCM did, supposedly, speak to the Captain later in the flight raising the crew's concerns - but the answer to us was "well, nothing happened, so it's not worth worrying about."

In total the passenger was on board, according to the SCCM under the Captain's supervision, for at least 20 minutes before the crew could board and start completing our security checks.

As I said I submitted a similar report a number of months ago and was told to report again should a similar thing arise. I find the whole thing really troubling and I have real concerns that this has happened again and how many other times does this occur when I have experienced it twice in six months.

Operator Comment: It is stated in the Operations Manual that all security checks must be completed and verification passed to the SCCM before passengers are allowed to board the aircraft.

Cabin Crew can and should challenge the Captain if they believe procedures are not being followed, especially if they believe security is being compromised.

CAA Comment: The incident refers to an alleged infringement of security procedures. The occurrence relates to the actions of one individual, which is appropriate for the operator to address internally.

CHIRP Comment: Notwithstanding the reporter's concerns, this is a rare occurrence. Furthermore, the visitor was under the Captain's supervision throughout and such visits can be motivating to aspiring pilots. However, the incident constituted a breach of Company SOPs, so the information was referred to the Company who confirmed that the event was under internal investigation. Cabin crew should continue to report each and every occurrence like this to the company through the company reporting programme.

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CAPTAIN ATTEMPTED TO GRANT PASSENGER ACCESS TO THE FLIGHT DECK FOR LANDING

Report Text: On this flight, I received a call from the Captain telling me to send a passenger into the flight deck for landing into base. At first, I thought they must have meant the fwd. galley. After speaking to the SCCM, I was informed that they had asked them the same which they had ignored. I was informed that the Captain did not know the passenger but the passenger knew them from school and also knew their sister.

I made it clear to the SCCM this was a breach of our policy and I was not happy with allowing anyone without a company ID pass into the flight deck and without this being cleared by ground staff. The SCCM agreed they were not comfortable with this either and told the Captain no. They questioned why they and the cabin crew were not happy with allowing this. The passenger did not enter the flight deck. The Captain apologised about putting us in the position. I was also told by one of the other cabin crew on this flight that this is very normal for them to do this.

I have not reported this to the company as I feel I would be punished for reporting but it's been on my mind ever since it happened and I worry deeply something could happen and I will regret not having reported it.

Lessons Learned – I think that the company need to be reminded that this is not allowed. A Memo needs to be sent to all staff on this.

CAA Comment: Air carriers based overseas need to meet their own national regulatory requirements but once an aircraft registered overseas enters UK airspace, the requirements set out in the UK National Security Programme for any passengers present in the flight crew compartment to move to the cabin apply. This includes when the aircraft is on the ground with its engine running or in UK airspace, when travelling in to or out of any UK destination and any overflights. The specific regulations governing access to the flight crew compartment are contained within Chapter 10 of the UK National Aviation Security Programme.

CHIRP Comment: The reporter and SCCM are commended for their moral courage in ensuring the regulations were followed. Also, well done the Captain for recognising his error and apologising. Most, if not all UK operators restrict the ability for passengers to visit the flight deck to when the aircraft is on the ground only. During flight, the flight deck door should be closed and locked and should only be accessed by the operating crew. Staff members who hold an airside security ID may be able to use the flight deck jump seat for take-off and landing but this should only be used in accordance with company procedures and have been agreed by the operating Captain.

This report however concerned a foreign operator, operating with UK cabin crew into a UK airport. Not all foreign operators operate using the same flight deck policies as UK operators, so there is the potential for different crew members on the same aircraft being accustomed to operating to different rules, with the result that innocent but actually inappropriate orders or requests could be made.

Although this should be a matter for the aircraft operator to address in the first instance, it is important for flight and cabin crew to be aware of the potential for conflicts to arise in such circumstances and be willing to challenge when necessary.

It has been noted that the reporter felt that they could not report their concerns directly to the company for fear that they would be penalised for doing so. Safety concerns should be reported wherever possible to the company to enable them to conduct the necessary investigations. In this instance, the reporter could have used the CAA Whistle-blower system to report their concerns confidentially.

The report will be passed to the company with the suggestion that a notice be issued to all flight crew reminding them of the standard procedure for flight deck access during flights.

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Reports received by CHIRP are accepted in good faith. While every effort is made to ensure the accuracy of editorials, analyses and comments published in FEEDBACK, please remember that CHIRP does not possess any executive authority.

CHIRP FEEDBACK is published to promote aviation safety. If your interest is in improving safety, you may reprint or reproduce the material contained in FEEDBACK provided you acknowledge the source.

CONFIDENTIAL HUMAN FACTORS INCIDENT REPORTING PROGRAMME (CHIRP)

DIRECTOR (AVIATION) JOB DESCRIPTION

The CHIRP Charitable Trust provides an independent confidential safety reporting system for the UK aviation and worldwide maritime industries. The Trust is seeking an experienced professional air pilot with a good understanding of operational safety issues in the Air Transport and General Aviation sectors for the part-time role of Director Aviation (D Avn). The workload is anticipated to be the equivalent of 4 full days per week, managed flexibly. D Avn is a senior leader and champion of open reporting and Just Culture within the aviation environments with the ultimate focus on driving safety improvement (see note 1).

D Avn is responsible for managing the Aviation Programmes in accordance with the Board of Trustee's policies and priorities under the strategic supervision of an Executive Director with the aim of improving aviation safety. He/she oversees the Cabin Crew Programme and operates the Air Transport (AT) and General Aviation (GA) Programmes. Day-to-day operation of the AT and GA Programmes requires D Avn personally to process air safety reports from receipt, through assessment to closure, maintaining contact with reporters and liaising with regulators and industry. CHIRP recently rolled out a facility for drone remote pilots to submit safety reports and is investigating the provision of an independent Peer-Pilot Assistance Network.

Professional pilot experience, which is likely to include recent time in command of multi-crew aircraft, is essential to provide an intuitive understanding of the air environment and credibility with reporters. Senior leadership/management experience is highly desirable in order to view issues from a strategic perspective and to manage relationships with industry and regulators at an appropriate level.

The successful candidate will understand the management of risk and the Human-Factors issues associated with working in safety-conscious resource-constrained environments. He/she will enjoy engaging sympathetically with people, be experienced in drawing on diverse specialist advice and have excellent interpersonal and communication skills.

CHIRP is in the process of moving to a 'virtual office' construct. The majority of D Avn's role can be carried out remotely using cloud-based IT though many essential meetings are necessarily held in London and the south east of England.

Note 1. Previously the role of D Avn was combined with that of the Chief Executive (CE) as a full-time position. In future there will be an Executive Director to fulfil the CE role.

Register your interest and we will send a more detailed job description. To apply, please send a CV and covering letter to mail@chirp.co.uk by 30 November 2019. Interviews will be held in January.

Designing a new NOTAM System: ICAO Questionnaire

The International Civil Aviation Organisation (ICAO) has launched a questionnaire on NOTAM and the NOTAM system and is asking for feedback from users.

Your response will help design a new system.

The online questionnaire remains open until 31 October 2019: <https://forms.gle/pEvdLFUwT5AksbTp9>

As advised by ICAO: In answering the questions think of the ideal NOTAM system while keeping in mind the distinction between the content of the NOTAM and the presentation of the information.

Advertisements Below Published on behalf of NATS

Volunteer Pilots wanted for ATCO Refresher Training (ART)

Courses Run Throughout the Year

- ✈ *Opportunity to visit Swanwick Ops Room*
- ✈ *Classroom discussion with ATCOs & time watching in our Simulator*
- ✈ *Session times approx. Area Control 1300-1800 & Terminal Control 1400-1900*
- ✈ *Reasonable travel expenses paid**

**Car expenses up to 260 miles. Alternative travel to be confirmed prior to visit*

Email ART@nats.co.uk for more information

Volunteer Pilots wanted for Scenario Training for Aircrew & Controllers (STAC)

Sept 2019 -April 2020

- ✈ *Opportunity to visit Swanwick Ops Room*
- ✈ *Classroom discussion between pilots & ATCOs*
- ✈ *Session times approx. 0900-1600*
- ✈ *Reasonable travel expenses paid**

**Car expenses up to 260 miles. Alternative travel to be confirmed prior to visit*

Email ART@nats.co.uk for more information

CHIRP DRONE & UAS REPORTING PROGRAMME

CHIRP has rolled out a drone safety reporting programme to provide a reporting channel for drone remote pilots similar to that provided for manned aviation. Drones should be treated as just another sector of aviation; safety/hazard reporting processes should mirror those used in manned aviation as closely as possible to foster a cooperative ethos of 'all on the same team'.

Commercial drone operations will be similar to commercial manned operations. Remote pilots and other staff will be expected to report safety issues to their company; the company will forward reportable issues to the CAA. Individuals who are unwilling to report to their employer may wish to report to CHIRP.

Remote pilots flying drones for leisure may wish to report safety issues to seek reassurance or guidance about their actions, for cathartic reasons following an occurrence and/or for altruistic reasons wishing to share an experience.

CHIRP'S ROLE

For commercial drone operations CHIRP's role should be the same as currently performed for manned commercial operations: to provide a safety net for reporters unwilling to use formal reporting systems. Reporters will be encouraged to use company or CAA reporting processes as appropriate. For those unwilling to report openly, CHIRP will forward disidentified reports to the organisation best able to investigate/address the reported issue.

Remote pilots flying drones for recreational or leisure purposes may have no background in, or knowledge of aviation, airmanship or reporting processes. CHIRP's role will be to guide and educate reporters to become 'air-minded'. Reporters will be encouraged to think of themselves as part of the national aviation community in which the processes, permissions and responsibilities are coherent throughout.

Members of the public wishing to report drones as a nuisance, concern, invasion of privacy etc should contact the police. It is not intended that CHIRP will act as a conduit for such reporting.

Drone reports will initially be assessed by the CHIRP General Aviation Advisory Board. Should the volume of reports require it, we will introduce a Drone and UAS Advisory Board with a dedicated Drone and UAS FEEDBACK newsletter. There is now a bespoke drone and UAS reporting form on the CHIRP website and we have received our first report.