

# CHIRP Cabin Crew FEEDBACK

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## CONTENTS

[Reporting Themes for 2016](#)

[Fatigue and EASA FTLs](#)

[Hard Rostering Practices](#)

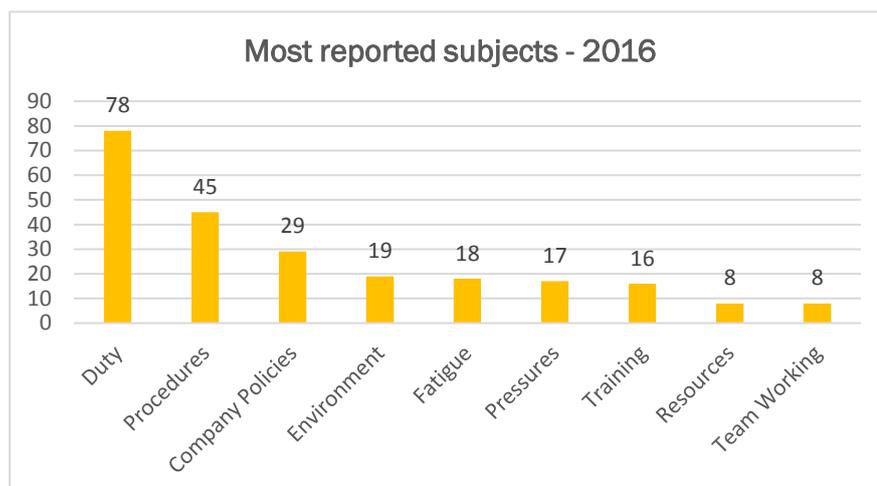
[Pressure to operate from management](#)

[Pre-Flight Briefing Procedures](#)

[Disembarkation of Aircraft without Flight Crew](#)

[Lack of Airport Security and Baggage Screening](#)

## REPORTING THEMES FOR 2016



The total number of Cabin Crew reports received for 2016 was 242; which was slightly higher than in 2015. Cabin crew reporting themes have remained consistent during the past two years, with the main subject reported to CHIRP being duty periods and rostering.

In some cases this has been related to changes following the introduction of EASA FTLs and the reporter's understanding of the new regulations. As always, we have encouraged our reporters to ensure that they have also highlighted their concerns to the company so that they are aware of all roster related concerns.

This is important as some operators have FTL schemes, which will have been approved by the CAA – often as part of their Fatigue Risk Management programme - while others may have a scheduling agreement with their Trade Union. Unfortunately, as CHIRP is not affiliated with any UK operator, trade union or the CAA we do not have access to these agreements or the specifics detailed within them.

Another steady reporting theme is the understanding and application of company procedures. These have included the following topics;

- Procedures during fuelling and boarding
- Window blinds at overwing exits
- Bracing procedures

- Pre-flight briefings
- Completing paperwork when occupying a jumpseat
- Flight crew controlled rest
- Pushback with passengers standing

We have included two reports in this edition of FEEDBACK which discuss the topics reported above, to highlight the lessons learned by the reporters.

[Back to Top](#)

### FATIGUE AND EASA FTLs

We are coming to the end of the first 12 months under EASA FTLs and some common factors have become evident. It is only fair to add some context before discussing these in detail. CHIRP has seen 34 reports from flight crew and 34 from cabin crew about EASA FTLs and fatigue, which is not many data points considering the number of flights by UK operators over the course of a year and the number of crew members.

The first year of EASA FTL was always going to be interesting. The system and the parameters within it must be kept under review but evidence will be required to support any changes. CHIRP is highlighting the issues reported to us to the CAA and the regulator is required to assess operators' performance in managing fatigue. Both flight crew and cabin crew must play their part by conscientious reporting through company channels:

- Predictive reporting when a roster is first issued to raise concerns about a roster and the individual's ability to rest for and within a certain pattern of work.
- Proactive reporting at the start of, or during, the duty (reducing a FDP or increasing rest are methods for managing fatigue included in the regulations).
- Reactive reporting when a duty has evolved in a way that crew members feel that fatigue either did, or could have, affected their performance in a way that they didn't predict at the start of it.

[Back to Top](#)

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### HARD ROSTERING PRACTICES

**Report Text:** I landed back from a long trip (westbound) which was then followed by 3 days off. Then I had an early start for a night stop with another early start the following day, no days off into a longhaul trip with one clear day downroute. I then had 3 days off, followed by another trip (eastbound) with one clear day downroute. With this in mind, over a period of three weeks I have been travelling from east to west, west to east and then back to west again. This has been extremely difficult given the large time zone changes. The amount of days off rostered between eastbound trips are not enough to catch-up and acclimatise before a westbound trip with one clear day downroute.

Lessons Learned - It is hard to have a lessons learned from a situation like this as this roster is legal but putting in place a rostering/scheduling agreement would prevent any individual from feeling as tired as myself.

**CHIRP Comment:** Whilst the above example can be classed as a legal roster, this does not mean that it is not fatiguing for crew members to operate. Each crew member has a responsibility to check their roster when it is published and to report any concerns about trip patterns before the roster starts. All roster concerns should be reported in the first instance to the company through the internal reporting programme, so that reports can be monitored and trend analysis completed by the company.

Article 1 of EASA FTL Regulation 83/2014 established that the Agency shall review the effectiveness of the current provisions concerning flight and duty time limitations and rest requirements. Such a review shall involve scientific expertise and shall be based on operational data. A first report will be delivered in February 2019. EASA have confirmed that the review will follow the regular EASA Rulemaking Process, which is public. The Agency will form a group of experts and interested parties to complete the review and draft a proposal NPA (Notice of Proposed Amendment). The NPA is then released for public consultation where anyone is able to comment online. The Agency will then process all comments into a second document with a reviewed proposal (Comment Response Document or CRD) and formalise the opinion which is sent to the European Commission to be discussed and approved.

Throughout the process, data and expertise is gathered to substantiate the changes but it is primarily during the drafting of the NPA that the majority of the work is completed. The Agency or the Rulemaking Working Group (RMG) may commission a specific study on the subject, rely on conclusive studies, collect and analyse data and/or gather additional expert advice. In this particular case, individual inputs such as CHIRP's will be considered. CHIRP or similar programmes, including labour and professional associations may play an important role by participating in the Rulemaking Working Group.

We have asked to be contacted by EASA nearer to the time of the review to be able to put forward our comments on EASA FTLs, which we have received through flight crew and cabin crew reports.

[Back to Top](#)

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## PRESSURE TO OPERATE FROM MANAGEMENT

**Report Text:** Upon arrival at our departure point (we reported at base and then had a 1hr journey time to the departure point) we completed our briefing and made our way to the aircraft to be informed the aircraft had only just landed. Once onboard the aircraft we were informed that the flight deck computer had a technical problem and engineers were trying to rectify it, however it was doubtful and a part was being sourced from the Maintenance department, which is back at our base.

As this aircraft has no crew rest facilities, we were informed later that morning that the crew would be going into discretion. The Captain and SCCM asked the crew if they were fit and well to go into discretion. After three crew objected, Crewing were contacted.

During boarding, a manager from the office boarded the aircraft and took crew who didn't want to go into discretion in the galley. We were asked the reasons why and continued that should we refuse to operate the duty, we would be investigated. Therefore making crew operate when they may potentially become fatigued. We also were told we were delaying another aircraft should the need to move crew become necessary, putting us under undue pressure and distress.

The company has a fatigue reporting procedure however due to the procedures and how it is investigated employees feel scared to report fatigue due to the consequences.

We finally pushed back 1hr 59mins late and arrived 1hr 52mins late into the destination. Thus putting us 52 minutes into discretion.

Lessons Learned:

- A more open culture and genuine acceptance of reporting fatigue.
- Cabin Crew Management should not be sent on-board an aircraft to pressure crew into operating with the ultimatum of doing the flight or being investigated.
- Adequate rest facilities should be made available on-board.
- Should an inbound aircraft have a known technical problem, delay the crew at home via text message to allow more rest.
- Reduce on-board services to retain energy and alertness.
- The part required for maintenance should have been sourced from the base we were operating from - should it be available - to reduce the delay time.

**CHIRP Comment:** It is the crew member's responsibility to assess whether they are fit to complete a duty, whether they are fatigued and if they are, to ensure that the company is informed via the correct company procedures. Fatigue can affect crew members in different ways – two crew members can operate the same duty, but one feels that they can safely operate and another unfit to complete the duty. However, it is not just the rosters worked that affect fatigue, daily life should also be considered when questioning whether they are suffering from fatigue and whether they have achieved adequate rest. As we have mentioned in the previous report comment, all crew members should check their roster when it is published and can report fatigue concerns before a flight/trip has been operated to alert the operator to a potentially fatiguing duty.

When a crew member reports that they are suffering from fatigue and cannot complete a duty, it is reasonable to expect the company to complete an investigation to find out why it has occurred. The operator has a responsibility to investigate whether fatigue is roster related or down to personal life/issues. How the investigation is handled is up to the specific operator, however it could be deemed as pressure on crew members to operate if management are present at the aircraft to instigate the initial investigation. If crew members have declined to enter into discretion, it would be appropriate to start the company investigation away from the aircraft and for the company to ensure that all crew members understand that they are not being penalised for not entering into discretion.

Fatigue and sickness absence are very different and therefore should be reported separately through the company reporting programme. Information on how to report fatigue is included in the company Operations Manual. Reports are monitored for trends and are a vital way of showing the company and the CAA potentially fatiguing trip patterns.

[Back to Top](#)

## PRE-FLIGHT BRIEFING PROCEDURES

**Report Text:** Recently an amendment has been made to the Operations Manual whereby the procedure for pre-flight briefings has changed. Previously the crew briefed and then proceeded to the aircraft to conduct pre-departure inspections and Security checks. This has now been changed so that crew meet in the crew room, check documentation and latest notices/memo's, liaise with the flight crew and proceed to the aircraft. Upon boarding the aircraft they then need to complete safety discussions and inflight service requirements.

The company has made these changes to enhance operational efficiency, but it simply does not work and has many flaws.

1. If the crew report 1 hour before departure, which is often the case, why not just complete the entire briefing in the crew room rather than wasting time then rushing onboard the aircraft? Once I have started my briefing it would be far more efficient to allow me to finish, discussions only take 5 minutes.
2. CRM is diminished by going ahead of the flight crew and boarding a cold aircraft - where is the sense of teamwork in that?
3. Passengers are advised to board the aircraft steps and wait for the crew to remove the safety strap before they can board. This has been a company policy for many years. In this case the passengers will hear the safety briefing taking place in the forward galley.
4. Whilst we are conducting the briefing the AFT doors, and more worryingly the L2 door is left open and completely unattended. This is a security risk.

I have raised my concerns internally, but have received unsatisfactory responses. I hope someone at the company can take my comments on board and respect the fact that someone has given feedback.

**CHIRP Comment:** We have chosen to print this report as there was a positive outcome from its submission to CHIRP. The operator wishes to thank the reporter for highlighting a discrepancy between the written procedure and actual practice for boarding passengers from aircraft steps. The company manual has now been amended accordingly and re-issued.

**The reporter has raised their concerns via the company reporting programme but it is not known whether these were then discussed as part of the Company Safety Management System.**

**The disidentified text of the report was sent to the Operator for comment, who advised that the aim was to make the briefings more effective and to minimise delays due to crew arriving late to the aircraft. Crew had been losing time from when the briefing finished to leaving the crew room, which meant that they arrived at the aircraft later than planned. No changes have been made to the briefings between the flight crew and cabin crew. Cabin crew arrive at the aircraft before the flight crew but only after the briefing has been completed.**

**Whilst the briefing is being conducted, all crew members are onboard and the safety strap should be placed across the door. All cabin crew should remain vigilant to identify any person who may wish to enter the aircraft. If the cabin crew are unable to do this, the aircraft door can be closed for the duration of the safety briefing.**

**The operator has reiterated that for cabin crew to give accurate feedback, they should first follow the current procedure. If they then encounter problems or have concerns about the procedure, these should be reported following the Company Safety Management System via the internal reporting programme.**

[Back to Top](#)

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## DISEMBARKATION OF AIRCRAFT WITHOUT FLIGHT CREW

**Report Text:** We are not permitted to board passengers on one of our aircraft types without pilots present. I believe this to be due to the operation of flaps at the overwing exits during an emergency.

We landed with a high volume of wheelchair passengers including WCHC. The handling agent informed us there would be a significant wait due to another operator requiring a large number of wheelchairs. The Captain prepared to leave, so I questioned the FO who asked the Captain. They said there was no APU so it was fine for them to leave.

I submitted a Cabin Safety Report which was originally acknowledged and I was advised of the SEP manual extract, which states that as long as there are no more than 10 passengers onboard it is okay to depart. I resubmitted my concerns, as I questioned why it was safe to be left during disembarkation but could not during boarding?

Had we had our front exits blocked by caterers, a fire on the airbridge and we were unable to utilise the overwings, then we would struggle to get to the last row of the aircraft.

If it's safe on disembarkation, then why when we have delays etc. can we not pre-board PRMs? It doesn't make sense. To be fair, the vast majority of pilots do remain with crew but it does happen from time to time so clarification is needed.

Lessons Learned - I would like reassurance why it is safe to have passengers on arrival without pilots but not for embarking please.

**CHIRP Comment:** The above report was passed to the CAA for comment who confirmed that the procedure for not requiring flight crew to remain on board where there are less than ten passengers, is compliant providing that the minimum number of required cabin crew are onboard the aircraft. If refuelling is taking place however, a member of the flight crew may be required to be present in the flight deck. The Operator has determined that with less than ten passengers flight crew are not required, if these passengers are PRMs they would be unlikely to evacuate via the main exits which do not require an extension of the flaps for evacuation.

It is also defined in EASA Regulation ORO.CC.205 that whenever any passengers are onboard an aircraft, the minimum number of cabin crew must be present in the passenger compartment. During ground operations with a reduced number of cabin crew, it is acceptable for there to be a means of initiating an evacuation available to the SCCM or at least one member of the flight crew to be present in the flight deck.

On discussing the concerns raised in the report with the Operator, it was confirmed that this matter had been raised internally. However, the policy was under review at the time and would therefore be communicated to crew members once the final procedure had been agreed. On this particular aircraft type, there should be at least one flight crew member in the flight deck during boarding, so that in the event of an evacuation one pilot is available to deploy the flaps. During disembarkation, the policy is that in unusual circumstances – not routinely – a small number of PRMs can be left at the front of the aircraft, provided that there are legal minimum required crew onboard the aircraft and a clear escape route has been established and communicated to all crew members.

All the above information was passed back to the reporter with the suggestion that they contact the company to discuss further so that they could explain what had been completed and what would be sent out in the communications to crew members.

[Back to Top](#)

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## **LACK OF AIRPORT SECURITY AND BAGGAGE SCREENING**

**Report Text:** Our airline operates daily services in and out of [a foreign airport]. I noticed/realised, for the first time on departure from [ ], that there are absolutely no baggage security checkpoints at this airport until one reaches the departure gate.

Passengers can enter the departures hall freely, then pass through immigration, then duty free shopping area with bags unchecked. There are hundreds of passengers and staff milling around. The stand is at the far end of one of the terminal buildings and is approximately a 20 minute walk, even using passenger travellers. It is only on arriving at the gate that passengers are subjected to a baggage search and personal x-ray.

In the wake of the airport bombings recently - notably Brussels and Istanbul, is it not extremely lax of this airport to have such a cavalier approach to security?

I hope it doesn't take the loss of some passengers and crew by an airport terrorist to make changes.

N.B. aircraft are also parked right by the gate - just outside....

**CHIRP Comment:** We have also chosen to publish this report in the flight crew's Air Transport FEEDBACK Issue 121 to remind readers that we all have a responsibility to report security concerns to relevant authorities and that reports are taken seriously. Department for Transport officials have confirmed that they have contacted the relevant National Authority about the issues raised in this report.

**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.**

### **Contact Us**

Stephanie Colbourne - Cabin Crew Programme Manager

CHIRP, Ancells Business Park, Ancells Road, FLEET, GU51 2UJ

Freephone (UK only): 0800 772 3243 or Telephone: +44 (0) 1252 378947

E-mail: [reports@chirp.co.uk](mailto:reports@chirp.co.uk)

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