AVIATION FEEDBACK

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An independent and confidential reporting system for the Aviation industry

AIR TRANSPORT

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Pressures and goals

Safety-first or safety-integral?

Contents

Steve Forward
Director Aviation

As I review this edition's crop of reports, they reflect a growing theme in recent months about perceived commercial pressures to cut corners, squeeze a quart out of a pint pot, and insufficient resources to conduct the task/duty. Of the 215 AT-related reports received so far in 2024 (including Cabin Crew reports), 58% (124) mention pressures in one way or another, be they commercial/financial constraints, management/supervision pressures, time pressures, discrepancies between formal and informal practices, or discrepancy between short- and long-term goals.

The post-pandemic recovery remains a work-in-progress, and aviation is still rebuilding to regain the robust cultures that we enjoyed in the years before. A significant part of this process is to rebuild the trust between management and workforce that was damaged as a result of decisions taken during the COVID period whereby existential measures had to be put in place by organisations to significantly reduce, or at best furlough, much of the workforce. It is not surprising that much of the workforce became disenchanted with their organisations as a result, and much of this ire was borne by the line-managers who were in the unenviable position of enacting 'orders from on high' in what was a necessarily highly reactive situation as lock-downs

came and went and international travel restrictions changed on an almost weekly basis.

Acknowledging that last summer was especially difficult as we returned to more normal schedules but with reduced resources, it is to be hoped that lessons have been learned and resourcing addressed; sadly, my commentary in the first paragraph suggests that this is not always the case. Accepting that the balance between safety and output is always finely judged, our well-worn mantras are 'safety first' and 'if in doubt, there's no doubt'. But do we practice what we preach? Is safety always first (if it was then we'd just leave the aircraft in the hangar), or should we recognise that there will always be trade-offs and it's a matter of risk assessment (which is why the Accountable Managers get paid the big bucks) and describe it instead as 'safety integral', i.e. at the core of everything we do rather than 'first'?

When we receive reports about things such as the boarding of PAX without flight crew or power on the aircraft; pressures to get students through training systems irrespective; time allowances between report and departure being shaved; or report times being moved airside to avoid the impact of security delays on FDP, then alarm bells start to ring. As a mature safety-aware sector, aviation professionals are not prone to crying wolf, so to have nearly 60% of reports to CHIRP this year indicate that there are overbearing pressures in the system to deliver beyond what might be considered realistic indicates that many will be tempted to cut corners in order to meet targets or deadlines and keep the show on the road.

Managers need to be alive to the primacy of safety over service-delivery/efficiency and listen to the workforce. That doesn't mean that every whisper or moan must be taken at face-value, but there's often no smoke without fire. Management is not just a matter of meeting KPIs or efficiency targets but requires leadership in taking the team with you and gaining their trust rather than simply meeting company imperatives.

For their part, the workforce needs to be flexible of course, but we must resist pressures to operate or conduct the task at hand if things aren't right or sensible. That's easy to say and hard to do when 'the management' is bearing down, but it's a fundamental part of safety. Sometimes the workforce doesn't have all of the context and so it's difficult to understand management policy and decisions, or workforce perspectives and expectations might differ greatly to that of the company. Either way, reporting through your organisation's SMS processes is important. If change is required, or at least gaining an understanding of why a decision has been made, little will be done without report data, observations or communication to support the need. Tea-bar moans rarely achieve much; the SMS should be a living tool and not just a document that sits on the shelf, but it relies on your inputs in order to identify and quantify problems that might not otherwise be apparent to the management.

The 'organisation' will inevitably default to maximising output; the 'people' must always operate with safety in mind – safety integral. Within that, all of us must remember that 'Just Culture' is a two-way street: the organisation must ensure an atmosphere of trust, where people are encouraged to provide essential safety information; the workforce must do their part to operate in a safe and responsible manner in applying policies, procedures and practices, and highlighting when this is not possible. Sadly, I see too many reports come across my desk that end with the words 'Please do not pass this to my employer because I fear for my job' or sentiments to that effect, which indicates to me that we all have a job to do to rebuild trust and Just Culture, especially given the loss of expertise and experience in many parts of the aviation environment in recent years.

Steve Forward, Director Aviation

Looking for a job?

Having filled the role of CHIRP Director Aviation for nearly 4½ years now, the time has come for me to move on to new pastures (or rather, to be put out to pasture!). If you're interested in taking on this part-time (4 days a week) working-from-home role to help other aviation folk resolve their problems, then why not let us know by registering your interest at mail@chirp.co.uk?

Report to CHIRP

Reporting to CHIRP is easy by using either our website portal or our App (scan the appropriate QR code shown or search for 'CHIRP Aviation' – ignoring the birdsong apps that may come up!). In our reporting portal you'll be presented with a series of fields to complete, of which you fill in as much as you feel is relevant – not every field is mandatory, but the more information you can give us the better. Although you'll need to enter your email address to get access to the portal, none of your details are shared outside CHIRP, and we have our own independent secure database and IT systems to ensure confidentiality.

Engineering Editorial

The modern technician grasps the importance of recording of work as a safety record, ensuring all tasks required have been carried out and as a trace back to various facts should a concern arise in service. But to engineers, as a breed of human that enjoys using their hands, aircraft paperwork has historically been something of a chore. One might think that your Tech Records department and possibly the Part M Continuing Airworthiness Management Organisation (CAMO) will discover and rectify shortcomings in the aircraft maintenance records.

Recording every engineering task and every component fitted to the aircraft is of importance. We are not necessarily thinking of trace-back to an individual here, especially for accountability, although knowing who was involved could lead back to human factors we might learn from. The Cat C licensed engineer needs to grasp frequently what has been carried out during the Maintenance Check whilst it is underway, (if they are hands on) plus historically before the maintenance input (AD's, SB's, Mods etc.) They need to establish if every component used has an Authorised Release Certificate (ARC) for its authenticity and future traceability. Note, only checking the ARC for part and serial number is of little value if the certificate carries other error/s. It is essential to record the Maintenance Data (Part 145.A.45) used. If there is no maintenance data to cover your activity, do not lie with a standard torque for the fasteners for example, report it to your Quality and Safety Department. Remember the batch numbers of consumables. The objective of recording of work is to have secure and easily retrievable records with comprehensive and legible contents. (Part 145.A. 55).

It is impossible to mention every permutation of procedures and their failings here, but we can all avoid paperwork errors. Perhaps your employer's procedures cover how records should be compiled based on past good and bad practice. It may be that you are expected to become an instant expert in this field the moment you are licenced and authorised. It is worth considering that your employer is selling the paperwork to the customer, as much as it is selling a nice shiny post-check aircraft. It is definitely in their interest to assist you and allow sufficient time in producing this safety and financially valuable product to the highest standard, especially as the aircraft operator can go elsewhere for maintenance, even if the operator and maintenance are separate divisions of the same organisation. The following are a few token common errors we should try to avoid.

- The record of the date should be numeric/alpha/numeric (04/Jul/24) even if you work in a British organisation on British aircraft that never leave the United Kingdom. The aircraft owner may well sell it to someone that thinks that 11/03/2024 is the 3rd November. You are also possibly giving ambiguous information to your foreign colleagues down the line.
- Never sign over your stamp number and obscure it.
- Never continue with a dry ink pad, the paperwork needs to be copied/scanned.
- Sign and stamp stages as you go, easily determined by task/trade breakdown on a Task Card.
- Never assume you can stamp everything up at the end of the shift, there are a great many HF or uncontrollable reasons why that might not happen.
- If the Approved Maintenance Data is being used as a Task Card, (although such practice is not detailed in Part 145.A.55) one must apply thought and common sense, to decide where the stages should be. Also, Approved Maintenance Data being used as a Task Card requires care to ensure your stamp does not encroach on any other stamps. If there is insufficient room on the page, raise a proper job card.
- Do not confuse Re-fit with Replacement, there is a significant difference.
- At every opportunity use the phraseology and nomenclature in the approved data, avoid using slang, even when everyone in the whole hangar knows what you mean.

This list is not exhaustive of course and there are many areas for the most conscientious to trip up, a number of them generated by the aircraft or component OEMs. Manufacturers seem to champion calling the same thing different from one another, contributing to our difficulties. Even the regulations can be trying. The Authorised Release Certificate (ARC) mentioned above, could mean Airworthiness Review Certificate (ARC). The concept of Left Engine/Right Engine as a barrier to error is over forty years old, based on possible confusion of which engine is Port and which one is Starboard in an emergency situation. This does not mean we should neglect Port and Starboard as an aid in verbal communications and recording of work. Take for example a defect in an Aft Lavatory. Regardless of the Lavs being numbered or otherwise, the defect is recorded as Left-hand sidewall covering split. Is that on the left as you enter the Lav? Is it on the left-hand side of the aircraft? Is it on the left when you sit on the seat cover, as if you were using the Lav? Taking this issue further, what about a defect with the Left-hand fore-flap. Left-hand, so outboard fore-flap, right? Because right-hand in this case must mean the inboard flap on the left-hand side, right? Although on the right wing, the left-hand flap is the inboard flap. Therefore, we record Port Wing Outboard Fore Flap.

Does the OEM use the philosophy of ALF (Aft Looking Forward)? One certainly needs to know but at least, Port is always Port and Starboard is always Starboard. Ambiguity could lead to disaster and perhaps should be considered a thread in the Human Factor, Lack of Communication. Aircraft records are written communication.

General Aviation, Rotorcraft and even un-manned/remotely piloted aircraft systems (RPAS) must be similarly affected. We all need to be vigilant in spotting these situations, especially when working multiple types and during fleet replacement programmes with the old and new side-by-side. Good recording of work and also talking the talk, provides your peers, customers and the regulatory surveyors/inspectors with confidence that you have a professional approach.

Phil Young, Engineering Programme Manager

CAA FTL Review

We have reported many times this year that one glimmer of light on the horizon is that the CAA have commenced a post-BREXITimplementation review of the assumptions within the whole UK rostering and FTL/FDP regulatory set so that they can determine whether there are any areas that could be better defined, harmonised or re-evaluated now that we are no longer part of the EASA regulatory regime. We look forward to the outcome of this review as a potential reset and clarification of many parts of the FTL AMC and GM material and the CAA have provided us with the following details on the TORs, scope and progress of this review which we thought would be of interest to our readership.

FTL Review TORs – core tasks. The review will include the following areas:

- Effectiveness of existing regulations and associated Certification Specifications (CS), Acceptable Means of Compliance (AMC) and Guidance Material (GM) for Commercial Air Transport Operations;
- Identification of regulatory gaps, (such as, Remotely Piloted Aerial Systems (RPAS) Air Operator Certificate (AOC) operations, and Non-Commercial Operations with Complex Motor-powered Aircraft (Part NCC) and Specialised Operations (SPO);
- Review of external published research studies, fatigue surveys, parliamentary enquiries, and other National Aviation Authority fatigue management regulations;
- Establish a roadmap to enable ultra long range (ULR) operations (>16 hours flight time and 18 hours flight duty periods);
- Identification of areas of influence, including other regulations that are outside of the CAA's regulatory remit ***(civil aviation working time regulation);***
- Effectiveness of CAA regulatory approval and oversight.

More specifically, the review will assess the impact of at least the following on the alertness of aircrew:

- Duties of more than 13 hours at the most favourable times of the day;
- Duties of more than 10 hours at less favourable times of the day;
- Duties of more than 11 hours for crew members in an unknown state of acclimatisation;
- Duties including a high level of sectors (more than 6);
- On-call duties such as standby or reserve followed by flight duties; and
- Disruptive schedules.

The CAA has engaged with the industry stakeholders in a focused way – a questionnaire has been sent to all ORO.FTL operators and CAP371 Air Taxi operators with the intent of determining:

- *Are there areas in the regulations where compliance creates unintended consequences for managing fatigue?*
- *Are there areas in the regulations that create confusion in their application?*

Once the stakeholder questionnaire responses have been collated, digested and recommendations have been formulated, the next step will be to consult with the wider aviation community to ensure that the views of those engaged in commercial aviation activities are taken into account. Ultimately the CAA wants to ensure that Fatigue Management regulations in the UK are fit for purpose, now and in the future.

I Learnt About Human Factors From That

Air Transport ILAHFFT – Monitoring automation and having clear CRM responsibilities

This report is taken from our US NASA ASRS [1]sister organisation's CALLBACK publication Issue 533 (June 2024) and refers to some sobering consequences of a B767 crew's VNAV interactions. The Relief Pilot's report is a little blunt in pointing out what wasn't done correctly, and neither report really explores why this incident occurred with 3 pilots on the flight deck. Perhaps the pre-approach briefing was not comprehensive, the responsibilities between PF, PM and Relief Pilot were not clear, or CRM had broken down in respect to following procedures. Press-on-itis and task fixation (everyone focusing on the approach and not monitoring vertical speed in this case) are well-known HF concerns that can be overcome by taking time to sit back and think about the bigger picture rather than dive into a course of action without having properly considered and briefed the potential threats and errors that might be waiting to pounce.

From the Captain's report:

We began the approach, but updated weather indicated the airport was below minimums, so we coordinated to hold. While in holding, [Company] advised that another flight landed successfully, and with updated weather, we had the visibility required to begin the approach. ATC amended our holding altitude from 5,000 feet to 7,000 feet, but we forgot to put our new cruise altitude in the Flight Management Computer (FMC) like we did before attempting the first approach. We received vectors to intercept the final approach course and commenced the approach but did not recognize our lack of vertical guidance due to not entering a new cruise altitude. The aircraft appeared to be flying the approach in LNAV/VNAV passing the final approach point, but began a descent rate approaching 1,500 fpm that wasn't recognized. The Relief Pilot and Pilot Flying (PF) began looking for approach lights as we approached minimums. They had the approach lights in sight, and so we continued the approach, still descending faster than planned. All of us were looking for the runway environment. At about the same time the PF and Relief Pilot saw 4 reds on the PAPI, we received an EGPWS terrain warning. I incorrectly called for a go-around instead of a CFIT (Controlled Flight into Terrain) recovery, and during the manoeuvre, the pitch attitude became excessive and we received a low airspeed caution as it decreased to around 105 knots. We completed the manoeuvre, sorted through the distraction of low fuel cautions due to our 10,000 pounds of fuel sloshing during the go-around, and diverted to a nearby airport.

From the Relief Pilot's report:

Following holding, the crew flew an RNAV [approach]. The crew made common errors on the approach and ultimately descended inappropriately below the minimum descent altitude using faulty visual cues…. The subsequent go-around resulted in a "Caution Terrain" and then "Whoop-Whoop, PULL-UP." … The descent had inadvertently been continued during the go-around, which caused the GPWS caution/warning. Then, the crew misapplied established procedures on the…go-around, which resulted in excessively slow airspeed. I had to intervene during both the RNAV approach and subsequent go-around to ensure safety. The crew should have realized there was not a proper vertical path and either modified [the] descent rate or discontinued the approach. Also, the crew should have had the situational awareness to know that they were still several miles from the approximate visual descent point and use that information when deciding to proceed below the MDA. During the go-around, the FO became task saturated with non-critical items (FMS, ATC communication, etc.) and failed to monitor the flight path adequately and perform PM duties correctly. This greatly affected the safety of flight during the go-around.

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[1] As for *CHIRP*, ASRS collects voluntarily submitted aviation safety incident/situation reports from pilots, controllers, and others but on a much larger scale (ASRS currently receives 8-10,000 reports a month) and so, unlike *CHIRP*, they have limited scope to engage with the organisations concerned with individual reports to gain their perspective. As a result, most raw ASRS material is unverified, and some can be a bit emotive or lack perspective, but their alerts and CALLBACK newsletters provide a curated view on topical issues that offer useful areas for thought. For those seeking more data, the ASRS reports database is a public repository that provides the FAA, NASA and other organizations world-wide with research material in support of the promotion of safe flight.

We need your ILAHFFT stories!

The value of ILAHFFT is that it provides insights from those who have been there, done it, and have lessons for all of us to learn. If you have any anecdotes or amusing 'there I was…' stories then please do share them with us so that we can pass on the messages and inform others (ideally in a light-hearted and engaging manner). Send any interesting tales to mail@chirp.co.uk and put ILAHFFT in the subject header – we promise full confidentiality to protect the innocent (and not so innocent!).

Reports

Report No1 - FC5340/FC5341 – Briefing on the bus

Initial Report

FC5340 Report text: We have today received this email from the company about reporting for remote stands.

As you are aware OTP is important to us and our passengers and has an impact on your bonus. If you are on a remote stand please ensure you are briefing on the bus journey over. If for any reason you find this difficult please reach out to a member of the base team so we can work with you to ensure this is being carried out effectively. You should not be waiting until you are onboard to begin your brief.

I find this extremely concerning. We have not downloaded flight plans, seen the technical log of the aircraft, looked at the NTCs or briefing notes. We simply don't have the information to brief. Also, we are on a moving bus – this is not the quiet, comfortable space to conduct a safety critical brief!.

FC5341 Report Text: [Airline] have informed crew that when bussing to the aircraft we should conduct an interactive briefing. Firstly this is not a safe place to conduct a brief for many reasons. Often we are holding onto a handle to remain sturdy and there is usually constant chat from the bus driver as well as the cabin crew. We have no tech log as of yet, have not read

flight plans at this stage and probably still have not read mandatory NTCs. Often it is mandatory to update the IPad before even commencing a read of the above. With the background noise of an old bus engine it is often hard to even hear oneself think!

This is being pushed for one reason and one reason only – OTP. Management are becoming completely OBSESSED with OTP at the expense of Safety. Mark my words, one day there will be a safety incident where a MEL or CDL etc will be missed because [Airline] are pushing such a process.

Whilst no Captain who puts Safety No 1 will entertain such a stance, I URGE CHIRP to speak to the CAA and ensure [Airline] do not put ANY pressure on crew to conduct such a ridiculous, unsafe and unrealistic process.

Company Comment

Our operations manuals state that the briefing may take place onboard the aircraft or in another suitable location. Safety is paramount, and we would expect our crews to make an assessment of the suitability of the location prior to conducting a briefing.

The method of transport to the aircraft may vary widely across the operation, from larger buses shared with other crew to private minibuses where crew are all seated in close proximity to each other. Crew are empowered to use this time if appropriate and consideration should be given to briefing in the terminal (if awaiting the arrival of an aircraft) or conducting the briefing onboard.

The briefing consists of multiple elements, including introductions, allocation of working positions, customer service standards etc. and it may be that some elements can be discussed during this time. Our crews should not be conducting the briefing in a location if it is not safe or appropriate to do so, or they do not yet have access to the information required.

CAA Comment

The company response correctly articulates the regulatory requirements and gives captains the pragmatism to make the right decision for the crew depending on the circumstances on the day. We have no further comments to add.

CHIRP Comment

Whilst we accept that the company comment provides appropriate guidance, its contents appear to be somewhat at odds with the directive nature of the initial email that was sent to crews in which the expectation was that "*If you are on a remote stand please ensure you are briefing on the bus journey over… You should not be waiting until you are onboard to begin your brief.*" The company's subsequent comment to CHIRP therefore provides welcome clarification that "***Our crews should not be conducting the briefing in a location if it is not safe or appropriate to do so, or they do not yet have access to the information required***." thereby confirming the captain's authority not to brief on the bus if they do not think it appropriate and to delay the briefing until on the aircraft if necessary.

The disparity between the original email and the Company comment clarifying their position on briefing requirements highlights the need for care in publishing email communications to company personnel. Crews are busy people and will likely take at face-value such communications when they might not necessarily be framed in the way intended. To remove all doubt in this case, CHIRP suggested to the Company that they issue a further clarification email based on their comment to us that captains should not be conducting the briefing in a location if it is not safe or appropriate to do so, or if they do not yet have access to the information required. In response, the Company have confirmed that communications have been sent out to the crews to provide clarity around suitability of briefing areas (bus or otherwise); that crew should only brief on the bus if appropriate; and that other locations may be utilised, including on the aircraft if nothing is suitable before this point.

Briefing on a small bus with seats during journeys where the crew are the only occupants may be one thing (such as travelling from a stop-over hotel to the airport where it may be a pragmatic use of 'dead' time), and is probably fine on occasion. But CHIRP does not think that it is appropriate as a routine procedure when travelling by airport buses to remote stands, potentially with other crews, and potentially in buses where there are no seats. Such airport crew buses are generally large buses that are not conducive to conducting pre-flight briefings, especially because the airport environment is such that frequent sharp turns, stops and starts will be experienced that mean the bus is unlikely to be a stable environment for people to stand up and brief their crew. There are also potentially serious safety implications if crew members do not properly hear such bus briefings due to noise etc or are not able to give their full attention to the brief as they try to retain their own balance; associated misunderstandings could easily lead to accidents or incidents.

We would also suggest that any reference to OTP, KPIs and the impact on bonuses is inappropriate in email correspondence of this nature because it will be perceived as overtly encouraging people to cut corners (such as by briefing on buses) as an expected norm, which is counter-productive to safety.

Report No2 - ENG752 – Commercial pressure and lack of certifying manpower

Initial Report

A scheduled engine change was planned for outside the hangar. Weeks in advance I stated I was not comfortable with this due to relative inexperience on that critical task and there were no experienced staff available to support me. I was told it was OK, they would get a different team to run it. The day of the aircraft arrival I was told I am doing it and they have got another contractor to assist but he doesn't have engine change experience. The aircraft was in work for approximately 12 hours when the customer had an AOG in their fleet and asked to return the a/c back to service (no critical tasks had been performed, mainly access and it was all documented). Company management told me to continue. They then told me to tell the customer we would meet the agreed downtime (5 days) even though management knew it would be at least 7 days or possibly more due to work stoppages (working outside in the winter). The pressure put on me was incredible, so I stopped all work until management told the customer what was actually happening. There is another engine change scheduled for outside again next week and, after expressing my concerns, I've been told I've got no choice, there is no one else.

In the hangar in general there is a massive shortage of engineers. Down to as few as 2 B1s per C-check and up to 30 mechanics. Currently running 3 lines of maintenance in the hangar and one line outside. Many engineers are feeling under pressure and there have been many IORs and MORs raised for missed inspections, missed independent inspections, and even mechanics doing inspections with engineers having to just over-sign.

CHIRP Comment

After initial contact, the organisation did not comment further and the reporter was uncomfortable in allowing CHIRP to contact the CAA. It is worth noting that CHIRP reports passed to the CAA with the reporter's permission often become whistleblower reports and as such are subject to strict CAA confidentiality procedures.

Mechanics carrying out inspection tasks was covered in CHIRP Air Transport FEEDBACK Ed 150 (April 2024) and this report highlights three further aspects of risk, driven by Human Factors issues.

Staff shortages have become a recurring theme in recent CHIRP engineering reports. Two B1s for a C-check sounds very concerning and one can only wonder if the man-management of thirty mechanics would undermine the time available for licenced staff to address their technical duties.

We have all worked outside in inclement weather, especially for AOG situations. We all know the mitigations required for the weather when working outside such as additional blanking of tubes and connectors, covering exposed areas of the aircraft that we perhaps would not need to do for short periods inside the hangar. We also know that our performance is affected under outside cold conditions from things like cold hands and toes, streaming eyes and nose etc. Carrying out tasks within the bypass duct might appear to be the ideal shelter, until the cold wind blowing across a flat airfield starts whistling through. Apart from a natural desire to hurry the job and get back inside, our attention span is reduced and even our communications are at risk of being curtailed, misunderstood or just missed. It was not possible to establish if the maintenance organisation knew in the beginning that the work would have to take place outside or not. Did the Operator and it's Continuing Airworthiness Organisation think an engine-change outside was acceptable? Did they just contract out the work and forget it was taking place? Did the Operator provide an onsite representative? Did any party consider the implications of multiple organisations working together?

Another concerning question raised by this report is that of competence to conduct work. An organisation can have a very effective competence assessment procedure but the second a staff member says they are concerned that they do not have the correct experience, the work should stop until a safe solution is found. It shouldn't be necessary to repeat this, especially in CHIRP Air Transport FEEDBACK but, to be clear, if there's no approved data, you stop; if there's no approved tooling, you stop; if there's no authorised components, you stop; if there's no staff, you stop; if there's no ground equipment, you stop; and last, but in no way least, if you don't have confidence in your competence, you stop.

Report No3 - ATC843 – Procedural Control fallback

Initial Report

We are not a procedural unit and none of the controllers hold a Procedural licence. We don't have procedural procedures, the best we have are contingency radar failure shut down procedures/training. However, according to [local instruction], when we're SSR-only and an arriving aircraft has a transponder failure before or after establishing contact with us, we are now allowed, with the assistance of [Area Radar Unit], to provide the inbound aircraft with a procedural approach (again, not holding a procedural licence) whilst proving a radar service to our other aircraft. We don't do regular training on radar failure. I have been radar valid on the unit since [many years] and haven't so much as done a sim run on radar failure. Currently, MATS Pt2 Complete Radar Failure Inbound Procedures state that aircraft already under [ATCU] control and below MSA are permitted to

conduct instrument procedural approaches. We shouldn't be accepting a radar failure aircraft during SSR procedures if they aren't on frequency already.

The biggest issue is that we're expected to accept and then work an aircraft during SSR-only operations when the aircraft has had a transponder fail, isn't on our frequency and is not in our airspace. If the aircraft was already on our frequency and in our airspace then I agree that we shouldn't just send the aircraft away.

I believe we only have one or two controllers who have previously held a Procedural endorsement. There is no way to maintain currency on a Procedural endorsement at [ATCU] as we don't do Procedural Control and for those of us that are dual-rated, we sometimes only just achieve our minimum hours in Radar and Tower, having to take hours from our RitT hours to get over the line.

CAA Comment

There have to be pragmatic solutions in place for such circumstances were the alternative of diverting a transponder-failed aircraft may well be more risky than continuing the approach on a rare one-off basis with a controller who is not formally procedurally endorsed. We will review the associated MATS Pt2 procedures with the unit concerned to ensure that they are appropriate for the resources and training available.

CHIRP Comment

This report generated much debate within the CHIRP Advisory Board because, essentially, the procedure of applying Procedural Control (PC) by controllers who are not PC-qualified is, superficially at least, troublesome. As background context, there are not many controllers who are PC-qualified these days at larger airports because modern practices, the increased use of RitT, and improved reliability of aircraft and ground equipment do not regularly require its employment. As a result, PC procedures often rely to a large extent on retained knowledge from initial controller training supplemented by emergency simulation.

Maintaining controllers with PC qualifications would come at a cost; the initial course is in the order of 6½ weeks to gain the qualification, although it is much simpler to revalidate someone who was previously qualified. However, controllers may not need to be fully PC-qualified in order to conduct one-off emergency responses to a radar-fail situation and so a safety risk analysis should have been completed to understand what mitigations were required to cope with the contingency procedure.

Accepting that some airports might be SSR-only for long periods if their radar was under maintenance, in effect, the situation equates to a double emergency of the airport radar not being available and the aircraft SSR failing; the likelihood of such a scenario was probably very small, and the airport's procedure had already allowed for the fact that, although they would only have a primary return to work with, the area radar unit would be available to assist the airport controller in positioning and identifying the aircraft; transponders do not fail very often and so the mitigations in place probably only need to recognise the low likelihood of such circumstances.

As a similar example, some airports no longer have SRA-qualified controllers but contingency plans often recognise that an SRA might be given by a controller if required in extremis in order to guide an aircraft to land. All that being said, controllers should be given simulator training to allow them to understand the intricacies and nuances of PC approaches, and how they might interact with the area radar unit to achieve situational awareness; CHIRP controller members were surprised that the reporter had not done any radar-failure simulation even if they were not PC-qualified, and they felt that this should be a key part of all radar controller training and recurrency that the ATCU and CAA should focus on during their review of the ATCU's MATS Pt2 and SMS risk mitigations.

Report No4 - GHS070 – Unacceptable treatment by security

Initial Report

I arrived at Security 1 hour and 25 minutes prior to operating [Location] – [Destination] in order to allow adequate time for the important performance calculations required for this Cat C airfield. Both sectors were due to be full pax loads, and careful checking of aircraft status, landing and take-off performance was vital as we were close to maximum operating weight limits. The sector was my own [destination] route check.

I removed all items likely to activate the security scanner from both my flight bag and my clothing. My personal effects passed through the x-ray with no concerns. The scanner activated as I walked through and I was called for what I presume was a random search. I have done this a thousand times but what followed was degrading and humiliating.

With little or no courtesy, I was told to spread my arms and legs out so that the handheld wand could pass over my body. No activation. The operative then ran his thumbs around the inside of my trouser waistband, and as he did this, the back of his hand brushed against my genitals. I felt extremely uncomfortable but said nothing at this stage. I was told to remove my shoes and my legs and feet were scanned again by the handheld wand. Still no activation. I was then told to stretch out my legs and stocking feet so that I could be scanned again. I pulled up both my trouser legs to my knees to show that I was concealing

nothing but was then ordered to pull down my trouser legs so they could be scanned again and told that I had violated their procedures. I protested that by now things had gone too far and was engaged by the entire group of 5 security staff, one of whom demanded I hand over my airside pass. I refused to do this and the scene escalated into an angry exchange based upon my apparent unwillingness to be thoroughly searched. I was told that I could not from this point touch or use any of my personal equipment as I was in contravention of their procedures. This was 5-1 aggressive bullying behaviour. I did, however, manage to get to my phone and called [Operator] Ops to explain I was being detained by Security and I passed the call to a security operative to explain why. The situation deteriorated further to a point where the Duty Manager was called. After the 5 of staff had a group discussion with him, I was asked for my explanation. I gave a factual account, adding that his team were aggressive, intimidating and looking for trouble. At no time had I activated the scanner.

I was then taken behind a screen where I was body searched again, witnessed by 2 more operatives. It felt like being admitted into custody. Once again, there were no activations and I was allowed to proceed to the aircraft, by now late for my report and furious at the way in which I was detained. The whole experience had eaten up 25 valuable minutes. I was by now in no fit state mentally to operate, but there were no other [destination] qualified crew, so I judged that I should calm myself down and do the duty. I rushed through the flight preparations and the flight departed 15 minutes late.

What concerns me most is my distracted state of mind at that time. In 25 years, I have never felt so overwhelmed by anger and frustration as I set take-off power on the runway as we departed for [Destination]. The root cause was the heavy handed, aggressive and disproportionate way in which any observation on the way I was treated by no fewer than 5 staff members were received. In most other walks of life, this would not be tolerated, though it is becoming the new 'normal' at [Location] Airport.

CHIRP Comment

This report is but one of many disturbing security reports received by CHIRP about seeming over-zealous security screening practices. These concerns apply to all major UK airports, but sadly the ability of CHIRP to address security concerns has diminished considerably due to lack of engagement by security stakeholders. Although we have contacts with CAA AvSec staff, we are told that although they can provide contact details for associated agencies, they will only become involved in reports where there has been a breach of Regulatory Compliance rather than for issues that they perceive as customer relations problems resulting from the application of processes. But the application of onerous security procedures that exceed the requirement (although superficially a laudable goal because who could argue against more security?), carries with it its own hazards of introducing safety risks elsewhere. Although it is understandable that security requirements are location and context specific, within this there is great variability and inconsistency between shifts and security personnel. The degree to which individual security teams might exceed the minimum security requirement should be monitored to ensure that they are not being over-zealous and unthinkingly introducing safety risks in the pursuit of unnecessarily superlative security. In this respect, in parallel with the 37 communications (or failed attempts at communications) with the associated security organisation in this report, we also contacted the Department for Transport (DfT) for their advice but we were simply referred back to CAA AvSec.

Why is this important? There appears to be an absence of a responsible stakeholder who might take up concerns about the wider aviation safety aspects of onerous security activities on aviation professionals. Moreover, it seems that these safety aspects and the sensitivities of distraction and pressures during worker screening are not widely understood by some security operatives or their organisations. Whilst perhaps operating within their regulations and remit, the deleterious effect on aviation workers' dispositions and fitness to operate as a result of overbearing security processes must be highlighted to those security staff who interact with aviation professionals; unlike most PAX, crews and aviation staff undergo security screening every day and, even without such one-off incidents as described, the cumulative impact of overbearing checks can also soon mount up. Every link in the aviation chain has a duty to promote or be cognisant of air safety. Whilst physical safety from security threats is of course vital and must be suitably thorough, there needs to be an awareness of the safety threats associated with workforce distraction or time pressures introduced as a result of delays or attitude during security screening.

CHIRP will continue to pursue these issues until there is a sea-change in communications and culture within security organisations to preclude the possibility of a serious incident or accident. It may eventually be the case that a member of flight crew doing a safety-critical role will be unable to operate due to security induced stress and so they must take themselves off a duty if this happens rather than pressing on to get the job done; the associated disruption to schedules might even be a driving force for improvement. Operators must be receiving internal reports of security difficulties; the question is, who will take up the challenge in driving change, rather than just filing reports (investigated or otherwise) in Safety Management Systems (SMS)?

Report No5 - FC5342 – Insufficient time allowed for duties

Initial Report

We fly an international programme from large airports. Report time is 1hr for all pre-flight planning, clearing security and preparing the aircraft. We routinely fly extremely long two crew sectors very close to flight time limits. If the true time taken was accounted for these flight's they would be illegal. It is the norm for pilots to arrive in the crew room having pre-briefed the entire flight at home and proceed directly to the aircraft without further time being spent. Even then 1hr is not enough.

CAA Comment

Operators are required to demonstrate that the report time is sufficient for the tasked required, if there is a systemic issue then we would raise this as a finding. We have commenced a post-BREXIT implementation review of the assumptions within the whole UK rostering and FTL/FDP regulatory set so that they can determine whether there are any areas that could be better defined, harmonised or re-evaluated now that we are no longer part of the EASA regulatory regime.

CHIRP Comment

The reporter's comments reflect perennial conversations we've been having with airlines and the CAA for many years. On the one hand, it was ever thus that report times are tight on FTLs, and the advent of EFBs has to some extent been a double-edged sword. There are 2 clear issues behind this report: firstly, the amount of time allowed by companies to conduct pre-flight tasks between report time and departure from the stand; and secondly, the degree of assumption that companies have that crews will conduct significant amounts of their pre-flight planning and briefing whilst off duty before report time. Although the company concerned may have a standard allowance of 1hr from report time to off-stand, this is not a universal policy and some companies have different allowances that often reflect whether the report point is airside or groundside. We recognise that tailoring report times to suit specific locations and journey-through-airport dynamics is not an easy rostering task because daily changes in aircraft availability, gates and terminals are a tactical factor that are not easily incorporated into pre-planned rostering. Nevertheless, it ought to be possible to incorporate better time-and-motion metrics into individual rosters for average report-to-departure durations (including airport arrival to report point) for individual airports to take into account the realities of what crews experience in practice (which may vary according to time of day) rather than assume a blanket 1hr standard for all.

With regard to EFBs and pre-flight activities themselves, whilst the expectation of some pre-preparation is not unreasonable, there are indications that companies are relying more and more on crews conducting pre-flight tasks using their EFBs whilst still at home and not on duty. Before EFBs were introduced, timings were very tight indeed, and their introduction has meant that at least some of the information is now more easily accessed and interpreted with the ability to do so well before report time. But there comes a point when company expectations need to be realistic in acknowledging what they assume to be done in off-duty time. Some sectors are of course more complex than others and so may attract a greater planning burden depending on conditions pertinent to that flight. Whilst pilots are generally a 'can do' bunch of people who accept a bit of duty-time flexibility, if companies start to rely heavily on such pre-planning before report point then this should be recognised within rosters as additional time added to the FDP.

Report No6 - FC5350 – FTL vs report point

Initial Report

Definition of Duty is "*any task a crew member performs for the operator, including flight duty, administrative work, giving or receiving checking, training and checking, positioning, and some elements of standby*". Currently our manuals have us as report to aircraft 45mins before departure. Competitors such as [Competitor] have their report point to the back of the security queue 1 hour before departure, since clearing security is a task that the crew member is doing as part of their duty. This gives [Airline] a distinct advantage as they can work us longer without going into discretion because you've checked in 15mins later – typically, on restrictive early shifts reporting 15mins earlier reduces the length of the FDP by a further 15mins (30 mins longer each day).

Also within the EASA Q&A's it states:

Reporting point ORO.FTL.105 (2): The global COVID-19 pandemic necessitated, on a number of occasions, a change to the typical aircrew reporting point. How should the operators address this change?

***Commencement of duty**. Duty starts from reporting for duty at the reporting point designated by the operator e.g. when the crew member checks-in in a crew room. In cases where the crew member is required by the operator to commence an activity prior to entering a crew room or a non-public area of an airport, so as to obtain flight documents at a check-in counter or ticket office, pass a security checkpoint or update the EFB, the duty starts at the point of commencing this activity. At airports where the crew members can access the non-public area or reach the departing gate through more than one security checkpoints, the operator should make sure that commencement time is the same for the same duty*.

I struggle to see how if EASA as the regulatory body state that passing a security checkpoint that it should be counted towards the duty period, how and why are [Airline] able to flagrantly circumvent this by requiring crews to make their way through security on their own time and be subject to less restrictive duty periods?

CAA Comment

The EASA FAQ material is not guidance nor AMC and so has no formal recognition. The CAA's role is to ensure that operators define their report point and that sufficient time is available to perform the required duties. We do not comment or compare individual airlines' policies in this respect but we have commenced a post-BREXIT implementation review of the assumptions within the whole UK rostering and FTL/FDP regulatory set so that they can determine whether there are any areas that could be better defined, harmonised or re-evaluated now that we are no longer part of the EASA regulatory regime.

CHIRP Comment

The relationship between report point, having sufficient time to conduct required tasks (including getting to the gate if appropriate), and FTL definition has been an ongoing topic that CHIRP has highlighted many times in recent months (most recently in AT FEEDBACK Ed149 Report No6 – FC5300).

As the reporter comments, although not applicable to UK AOCs, EASA has previously published a commentary about when FDP starts in relation to security checkpoints and report points in their document EASA FAQ n.135897 which is reproduced in full at the end of this report. The response is clear that, in their opinion, duty (and hence FDP) starts at the Report Point unless crew members are required to commence an activity such as passing through a security checkpoint. We have asked CAA whether they have a similar interpretation of when duty commences and they responded by saying that the journey time before report will be looked at as part of their ongoing overall FTL review this year which will consider the associated baseline assumptions and fatigue metrics. CHIRP thinks that more AMC/GM is required in this respect so that the burden of absorbing the time taken to pass through security etc does not fall solely on the crews as yet another stressor in their day but is included as part of FDP calculations for each airport situation.

EASA FAQ n.135897 (CHIRP underlining)

Reporting point ORO.FTL.105 (2): The global COVID-19 pandemic necessitated, on a number of occasions, a change to the typical aircrew reporting point. How should the operators address this change?

Answer

Aircrew typically used to report for duty at a crew room, at their home base or at outstation. The global COVID-19 pandemic caused disruptions in flight operations and necessitated, on a number of occasions, a change to the typical aircrew reporting point. Here below are some considerations that operators and aircrew should account for when addressing such change.

Notification to crew members. The operator must inform the crew about any change of the reporting point prior to operating as this is part of operator's responsibilities under ORO.FTL.110.

Travelling time to the reporting point. Due to the change of reporting point, the otherwise duty time may turn into travelling time, thus extending the usual travelling time that a crew member is accustomed or prepared for. Therefore, the operator should make sure that the impact of the change of reporting point on traveling time and consequently on crew fatigue is not significant. The operator' SMS has to manage the change of reporting point by assessing the potential negative impact on aircrew fatigue levels, based on evidence of adequate time frames and/or a comparison between the time necessary to report to the new point and the typical reporting point. In assessing the impact, the operator should account for additional operational factors e.g. standby call out times. The operator should address reporting at a place other than a crew room in the OM.

Commencement of duty. Duty starts from reporting for duty at the reporting point designated by the operator e.g. when the crew member checks-in in a crew room. In cases where the crew member is required by the operator to commence an activity prior to entering a crew room or a non-public area of an airport, so as to obtain flight documents at a check-in counter or ticket office, pass a security checkpoint or update the EFB, the duty starts at the point of commencing this activity. At airports where the crew members can access the non-public area or reach the departing gate through more than one security checkpoints, the operator should make sure that commencement time is the same for the same duty.

Aircrew briefing. The time for aircrew briefing is a duty time no matter where it takes place. If the briefing takes place at the gate where other people are also present, the operator should arrange for a secluded place considering security matters among other things. The size of the crew should not prevent crew members from talking to each other without disturbing and being disturbed. If the briefing takes place on board the aircraft, the operator should ensure that certain conditions are present, such as running APU/GPU, no disturbance from ground personnel or cleaning staff. Where the operator provides EFB, the briefing material should already be uploaded to it or if, new material is to be

downloaded, the crew must be provided with means to do so.

Reporting times. The operator should specify in the OM reporting times that account for the type of operation, ground duties, size and type of the aircraft and the airport conditions (GM1 ORO.FTL.205(a)(1)). Ground duties include pre-flight duties (briefings; provision of documentation; transport to the aircraft parking stand, etc.).

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