

# CHIRP CC FEEDBACK

Issue No: 39

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## EDITORIAL

### TIREDFNESS AND FATIGUE

We regularly receive reports in which the reporter describes a duty or a sequence of duties following which they state that they are suffering from fatigue.

In some cases, reporters have previously submitted a company report and have expressed disappointment at the company's response, which in some cases has been to record the individual as 'sick' as opposed to being 'fatigued' or to recommend that the individual seek medical advice.

In all cases reported to us, where sufficient information is provided, we assess the duty(ies) against the 'SAFE' Work/Rest computer model, which was developed by QinetiQ, on behalf of the CAA, and is also used by CAA to evaluate company rosters. In a significant number of cases that we review, the 'SAFE' model predicts only moderate levels of tiredness, so why should that be?

First, it is important to understand the difference between 'tiredness' and 'fatigue'. If you perform an extremely long but legal flight duty period (FDP) or a series of sectors during a long duty period, it is to be expected that you will feel very tired on completion of the duty. However, in such a case, the length of your subsequent rest period has been shown over many years to permit you to recover fully prior to your next duty, provided that you use your rest period for exactly that - adequate rest.

So what is 'fatigue'? Fatigue is commonly described as a physical or mental state of exhaustion which renders an individual unable to respond effectively to a situation or perform a function accurately. It can occur as a result of a very long period without rest/sleep, or as a consequence of a series of arduous duties with limited availability of rest between duties. Moreover, an individual suffering from fatigue may not be able to recover adequately during a subsequent period of rest, but this will normally only become apparent after the period of rest has been taken. The 'SAFE' programme is designed to predict levels of tiredness in both of the situations described above.

So what about discretion and fatigue? Your Captain (*not* your company) is permitted to exercise discretion on behalf of cabin crew members, thus permitting the maximum FDP to be extended by up three hours. The Captain is required to take note of the circumstances of other members of the crew (not necessarily seek their views). In a case where a crew member has reported for duty following a rest period that was longer than the minimum permitted, unless there were other exceptional circumstances pertaining, it would not be unreasonable for the Captain to assess that discretion could be exercised. In such a case, would the individuals be tired at the end of the extended duty? Undoubtedly; this fact would be acknowledged by the subsequent minimum rest period being extended.

One final point, what if your personal circumstances (e.g. small children) prevent you from gaining adequate rest? On the odd occasion, most companies would accommodate such a situation if reported; however, there is an obligation on both flight crew and cabin crew members to organise their rest such that they are able to report fit to perform their duties for the maximum duty period relevant to their report time, which might, on occasions, include discretion. This obligation is no more onerous than that placed on other workers, such as individuals performing safety critical tasks during night shifts.

### CHIRP OFFICE RELOCATION - IMPORTANT NOTE

At the end of October 2010, we moved to new offices in Farnborough as a cost saving measure. Regrettably, we were subsequently advised (after moving) that Royal Mail would not provide a Redirection Service as had been previously agreed.

We have arranged an ad hoc redirection service but this arrangement cannot be guaranteed; consequently it is important to remember that we always acknowledge receipt of confidential reports. If you've sent a report to our old address and haven't received an acknowledgement, please contact us again at the address at the foot of this page.

Alternatively, you can submit a report via our secure report facility online at [www.chirp.co.uk](http://www.chirp.co.uk).

### WHEN IS IT SAFE TO LEAVE CREW SEATS AFTER TAKE-OFF?

**Report Text:** I have decided to submit a report after changing fleets within my company; I have also worked for other airlines.

On my old fleet (and at previous airlines), we were allowed to leave our seats after take off **only** when the seatbelt signs were off, or if the Captain advised us to do so (normally by cabin chimes).

On my new fleet I have noticed that crew stand up and prepare for the service as soon as the landing gear is retracted. As the SCCM, I have questioned this, since not only do I think that it is unprofessional for pax to see the cabin crew standing (they also stand up themselves) but it is also very dangerous. We operate from a very busy airfield, with absolute minimum separation in between aircraft, and the danger of wake vortices or air pockets is ever present during the initial climb, not to mention low cloud.

When I challenged this with the crew, I have been informed that our manual actually states that the seatbelt signs are

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[confidential@chirp.co.uk](mailto:confidential@chirp.co.uk)

Freephone (UK only): 0800 214645 or +44 (0) 1252 378947

only for the pax to observe, and cabin crew can stand up as and when they wish!!! The manual states "unless instructed to the contrary by Captain, cabin crew may leave their seats once the aircraft is airborne (clear of low level turbulence and into its climb) the seatbelt signs are for the direction of the passengers and cabin crew do not have to wait for them to be switched off". So, how am I able to judge that we are clear of low level turbulence or low level cloud?

I have sought clarification from fellow SCCMs and have been told that we are operating in an adult environment so we are able to judge when it is safe to stand up. I am now wondering, no matter how adult someone feels, can we really judge that it is safe to stand up? It's only the pilots that can judge if we are not behind a larger aircraft.

I have also raised this with our flight crew; most agree that we should remain seated until the seatbelt signs are off and that they themselves only release their shoulder straps when the sign goes off.

What's the rush anyway? Our flights are principally long haul and we usually have 10 hours ahead of us?

My biggest worry is that if it is potentially dangerous for pax to stand up, then why should we be up too?

I would like to see the manual updated so we are allowed to stand up, when the pilots determine it is safe to do so.

**CHIRP Comment:** EU-OPS (1.085 (f) 9) states that a Captain must "not permit any crew member to perform any activity during take-off, initial climb, final approach and landing, except those duties required for the safe operation of the aeroplane".

However, some operators' SOPs permit the SCCM to decide when it is safe for crew members to leave their seats after take off to commence service related duties, prior to the seat belt signs being turned off. Whilst this might be reasonable in normal circumstances, a SCCM may not be aware of the presence of adverse weather on the departure routing. To avoid the possibility of a crew member being injured during a turbulence encounter, some operators' SOPs require that cabin crew members remain secured until the seat-belt signs are turned off or some form of positive release is signalled by the flight crew to notify the cabin crew when, in *their* judgement, it is safe to commence cabin service duties. Where a separate signal is given, it is good practice for the SCCM to make a PA to passengers advising them to remain in their seats until the seat belt signs have been switched-off.

In a recent Air Accidents Investigation Branch investigation into a turbulence encounter during which a cabin crew member was seriously injured as a result of not being strapped-in when the aircraft encountered turbulence (after the seat belt signs had been turned on prior to landing) the report noted:

"Clear communication and adequate notice of impending turbulence will therefore assist in protecting the cabin crew by giving them the opportunity to secure themselves".

## PRE-FLIGHT SAFETY EQUIPMENT CHECKS

**Report Text:** I would like some advice relating to pre-flight checks on safety equipment.

On several occasions recently when carrying out pre-flight safety equipment checks I have found the fire gloves to be dirty. Our company pre-flight check procedure is to ensure that the correct number of fire gloves is onboard, that they are securely stowed and clean. Recently when reporting to

the Captain that the gloves did not comply with the pre-flight checks procedure i.e. that they were not clean, he/she deemed them fit for purpose. I am confused as to why we have pre-flight checks if they can be ignored at the Commander's discretion.

If my company is content for dirty fire gloves to remain onboard and for the aircraft to depart, what is the purpose and value of pre-flight checks and what is the purpose of having an MEL if the Commander can override it or choose not to put it in the Tech Log?

In my experience if the Captain doesn't feel it is important it won't get the attention which I believe it deserves or ends up in confrontation which isn't good for CRM.

What happens if the SCCM disagrees with the Captain's decision and where do we stand? I have considerable flying experience and would not be comfortable departing with any piece of equipment that did not comply with SEP/SOP. I want to be 100% confident that all equipment would be fit for purpose and protect me. If you are saying that the fire gloves can be dirty then this is a 'grey' area and where do we stop, would it be okay to have a smoke hood or oxygen bottle that doesn't comply with procedure too?

**CHIRP Comment:** Fire gloves are provided for use in the event of an emergency and not for other purposes that may degrade their heat/fire resistant properties.

The determination of 'dirty' gloves can be subjective. For example, if fire gloves have been used incorrectly as oven gloves and have become soiled with fatty gravy/sauce, this could render them unfit for use as such contaminants could be flammable. Similarly, if the gloves have become wet this would also render them unfit for purpose as the wetness would conduct heat. If the gloves have simply been dropped on the floor or stowed in a dirty stowage this would not necessarily render them unfit for purpose.

This matter was raised with the company, following which a notice to crew was issued requesting that cabin crew refrain from using the fire gloves for oven use and to use the oven gloves supplied instead.

In relation to the reporter's concern as to the purpose of the Minimum Equipment List (MEL), fire gloves are a company requirement; they are not 'required equipment' and their unavailability for use does not affect the airworthiness of an aircraft.

A final point - If your company has a procedure in place it must be followed. SOPs are there for a reason and should not be deviated from; if the procedures cannot be complied with, report the matter to your company to permit them to be reviewed and amended, if appropriate.

## BOILING HOT CABIN

**Report Text:** We had a three-hour delay due to fog at our destination airfield. The APU wasn't working and there was no ground equipment so it was very hot in the cabin. The SCCM called the rear galley to say that the Captain had ordered the back door to be 'cracked' to allow air into cabin. I refused to open the door as we had no ground equipment in place. The SCCM visited the rear galley to open the door themselves, to stop the door slowly opening further they tied the cord of the oxygen demo mask between the two grab assist handles on the door and frame. Twenty minutes later the SCCM came back to the galley and closed the door.

**CHIRP Comment:** Whenever an aircraft door is opened, it must be in accordance with an approved procedure, such as ensuring that an appropriate set of steps/ground equipment are in place. Also, if passengers are on board the effect of the door/ground equipment configuration on an emergency evacuation should also be considered.

Whilst 'cracking' a door might appear to be innocuous in itself, the risk of injury, or worse, to crew members, passengers and particularly small children is obvious.

### CLARIFICATION RE: POSITIONING

**Report Text:** I was rostered to taxi from AAA(UK) to BBB(UK2) then to position the aircraft to CCC(Eu) to then operate back to AAA.

As I was the only cabin crew on board I questioned the company if it was correct for me to position on the aircraft instead of being part of the operating crew. I was told that because I had no responsibility on board for that specific sector and company procedures do not require a crew member to be on board for Fire Watching purposes I was actually a pax.

Theoretically how can I be a pax on a non commercial flight; who would be responsible in case of an emergency to operate the doors?

Obviously a positioning flight does not count towards the flight time limitation rules with maximum numbers of hours you can operate and also the flying time as positioning will not count towards the maximum hours you can fly per year.

Can you please advise if it was legal for the company to position me on this flight or should it have been an operating flight?

**CHIRP Comment:** If on a specific sector the only passengers are employees of the company and there is no freight other than 'company' freight onboard, then the flight is classed as 'non-revenue'. In this case, there is no requirement for cabin crew to be carried to undertake safety-related duties; crewmembers are thus regarded as 'positioning' or 'deadheading' (just as if you were travelling by bus or taxi). In the absence of operating cabin crew members it would be the flight crew's responsibility to arm/disarm the cabin doors and carry out safety briefings. If a cabin crew member is required to arm/disarm the doors, the sector would count as an operating sector. It should be noted that 'fire watch' duties are company procedures; there is no regulatory requirement for these to be performed.

For crew members who are positioning or deadheading without being required to operate a flight within the same duty period, the time spent is accountable as duty and not as flying duty.

If a crew member is rostered to operate one or more sectors within the same duty period after positioning, the time from the initial check-in for the positioning flight to the end of the subsequent sector(s) is regarded as the flying duty period.

If a crew member positions immediately after operating one or more sectors, the flying duty period ends after the operating sector. Any subsequent time spent positioning is regarded as duty and thus is used to calculate the subsequent minimum rest period.

### CABIN BAGGAGE

**Report Text:** I would like your opinion on a big issue we have at this base, but also network wide.

Since the change in checked-in baggage policy a few years ago and the rising cost to check baggage for passengers there has been a dramatic increase in carry on baggage. Whilst our aircraft can store approximately 90 standard sized trolley bags, our flights are usually full with up to 150 pax. Average baggage checked in is about 30 cases, which means we usually we have an extra 20 to 40 trolley bags to carry on board (depending on route and type of passenger).

When overhead lockers become full we cabin crew have to start offloading excess hand baggage. This often happens during boarding so the only place where we can temporarily stow the items is by galley areas (front and back).

The matter has been raised with the company due to blocked exits and, in case of evacuation, those exits are unusable which would considerably decrease pax flow but we have no other option. Maybe we should stop the whole boarding process and keep passengers outside the aircraft until all baggage has been offloaded?! This would heavily affect OTP and I am sure the company would not appreciate these actions but they have offered no acceptable procedures/alternatives to us cabin crew.

Another frequent scenario is that hand baggage is left in the aisle by pax in the hope that cabin crew will find somewhere for it - this makes it very difficult to move in the cabin.

**CHIRP Comment:** The following picture shows baggage that has been removed from passengers, being stowed adjacent to an emergency exit door, prior to its relocation to the hold.



We continue to receive a significant number of reports on the issue of cabin baggage and the difficulties cabin crew experience in trying to manage the situation. As these reports involve a number of factors such as routes, aircraft types and company procedures, the matter has been referred to the Civil Aviation Authority.

# CHIRP

## CABIN CREW REPORT FORM

**CHIRP** is totally independent of the Civil Aviation Authority and any Airline

Name: <input style="width: 90%;" type="text"/>	▲	Indicates Mandatory Fields	1. Your personal details are required only to enable us to contact you for further details about any part of your report. Please do not submit anonymous reports. 2. On closing, this Report Form will be returned to you. <b>NO RECORD OF YOUR NAME AND ADDRESS WILL BE KEPT</b> 3. <b>CHIRP</b> is a reporting programme for safety-related issues. We regret we are unable to accept reports that relate to industrial relations issues.
Address: <input style="width: 90%;" type="text"/>	▲		
Post Code <input style="width: 30%;" type="text"/>		Tel: <input style="width: 60%;" type="text"/>	
e-mail: <input style="width: 90%;" type="text"/>			

<b>It is <i>CHIRP</i> policy to acknowledge a report on receipt and then to provide a comprehensive closing response, if required. If you do not require a closing response please tick the box:</b>	No. I do not require a response from <b>CHIRP</b> <input style="width: 30px; height: 20px;" type="checkbox"/>
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**PLEASE COMPLETE RELEVANT INFORMATION ABOUT THE EVENT/SITUATION**

YOURSELF - CREW POSITION	THE FLIGHT/EVENT	CABIN ACTIVITY
SCCM <input type="checkbox"/> CABIN CREW <input type="checkbox"/>	DATE OF INCIDENT <input style="width: 80%;" type="text"/>	BOARDING <input type="checkbox"/> INFLIGHT SERVICE <input type="checkbox"/>
SUPERNUMERARY <input type="checkbox"/>	TIME <input style="width: 80%;" type="text"/>	DISEMBARKING <input type="checkbox"/> OTHER: <input style="width: 80%;" type="text"/>
OTHER: <input style="width: 90%;" type="text"/>	AIRCRAFT LOCATION <input style="width: 80%;" type="text"/>	<b>FLIGHT PHASE</b>
<b>EXPERIENCE/QUALIFICATION</b>	<b>THE AIRCRAFT</b>	PRE-DEPARTURE <input type="checkbox"/> TAXI <input type="checkbox"/>
TOTAL YEARS <input style="width: 30%;" type="text"/> YEARS WITH CURRENT AIRLINE <input style="width: 60%;" type="text"/>	TYPE/SERIES <input style="width: 80%;" type="text"/>	TAKE-OFF/CLIMB <input type="checkbox"/> DESCENT/LANDING <input type="checkbox"/>
<b>CURRENT AIRCRAFT TYPES QUALIFIED ON:</b>	NUMBER OF CABIN CREW <input style="width: 80%;" type="text"/>	STAND/GATE ARRIVAL <input type="checkbox"/> OTHER: <input style="width: 80%;" type="text"/>
1. <input style="width: 30%;" type="text"/> 2. <input style="width: 30%;" type="text"/> 3. <input style="width: 30%;" type="text"/>	NUMBER OF PAX ON BOARD <input style="width: 80%;" type="text"/>	<b>TYPE OF OPERATION</b>
<b>PASSENGER(S)/INJURY(IES)</b>	NUMBER OF EXITS <input style="width: 80%;" type="text"/>	SCHEDULED <input type="checkbox"/> CHARTER <input type="checkbox"/>
PASSENGER(S) INVOLVED? YES <input type="checkbox"/> NO <input type="checkbox"/>	<b>WEATHER (IF RELEVANT)</b>	CORPORATE <input type="checkbox"/> OTHER: <input style="width: 80%;" type="text"/>
INJURY TO PASSENGER <input type="checkbox"/> INJURY TO CREW <input type="checkbox"/>	TURBULENCE <input type="checkbox"/> THUNDERSTORM <input type="checkbox"/>	<b>MY MAIN POINTS ARE:</b>
<b>THE COMPANY</b>	OTHER: <input style="width: 80%;" type="text"/>	A: <input style="width: 90%;" type="text"/>
NAME OF COMPANY: <input style="width: 90%;" type="text"/>	<b>REPORT TOPIC / MY REPORT RELATES TO:</b>	B: <input style="width: 90%;" type="text"/>
		C: <input style="width: 90%;" type="text"/>

**DESCRIPTION OF EVENT**

Your narrative will be reviewed by a member of the **CHIRP** staff who will remove all information such as dates/locations/names that might identify you. Bear in mind the following topics when preparing your narrative:

Chain of events • Communication • Decision Making • Equipment • Situational Awareness • Weather • Task Allocation • Teamwork • Training

**continue on a separate piece of paper, if necessary**



PLEASE PLACE THE COMPLETED REPORT FORM, WITH ADDITIONAL PAGES IF REQUIRED, IN A SEALED ENVELOPE TO:

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Report forms are also available on the **CHIRP** website: [www.chirp.co.uk](http://www.chirp.co.uk)