

CHIRP

Confidential Human-Factors
Incident Reporting Programme

Aviation FEEDBACK



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CABIN CREW



Fatigue – it’s a tiresome issue

Because it’s subjective, there’s no one definition of tiredness or fatigue, but if you are suffering don’t be afraid to report it

As operations ramp up, so does the volume of CHIRP reports, particularly fatigue-related CHIRP reports. In January 2022 CHIRP received 15 safety reports, 11 of those were related to fatigue.

The effects of fatigue and an individual’s susceptibility to it are not an exact science; each individual can react differently under the same circumstances, they may even react differently themselves if faced with similar situations on another occasion. The CAA have regular interactions

with the larger airline Director Flight Operations (DFO) representatives and work in conjunction with the airlines in a fatigue working group to address issues.

As we regularly advise, cabin crew must not operate if they are not fit to do so, and have a responsibility to ensure adequate rest is achieved prior to duty. Crew should report internally if they are unrested or fatigued, if not, there will be insufficient evidence for the operator (or the CAA) to review if this could be occurring due to the rostering of flights and/or rest periods between duties. →

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What happens to your safety related cabin crew CHIRP report?



Why should I report?

Without safety-related reports there is insufficient evidence for an operator (or the CAA) to see that ongoing safety concerns or incidents could be occurring.

An operator receives reports and uses the data from the reports for analysis, for example, if a significant amount of crew report that a new SOP or new service is impacting their safety duties, then the company will be aware of a potential safety concern, the operator may then review the new SOP or service and amend it accordingly, or put other safety mitigation in place.

However, if crew do not report the issue, then the company will not be aware or see any emerging trends. Safety reporting is not about complaining, it's about identifying hazards and risks to enhance safety for everyone onboard.

CHIRP have also received cabin crew reports regarding a lack of inflight rest provided on board the aircraft during long haul sectors. If the maximum FDP needs to be extended, then 'inflight rest' is required. If the FDP does not need to be extended then inflight rest is not required, however in accordance with [ORO.FTL.240 Nutrition](#) a meal opportunity is required.

MEAL OPPORTUNITY

a) The operations manual should specify the minimum duration of the meal opportunity, when a meal opportunity is provided, in particular when the FDP encompasses the regular meal windows (e.g. if the FDP starts at 11:00 hours and ends at 22:00 hours meal opportunities for two meals should be given).

(b) It should define the time frames in which a regular meal should be consumed in order not to alter the human needs for nutrition without affecting the crew member's body rhythms.





For some operators this meal opportunity may be a set period of time, whereas other operators state that crew must take regular breaks and take nutrition as required throughout the duty (no set time is specified).

Any meal opportunities / refreshment breaks or inflight rest should be managed accordingly ensuring that the appropriate amount of crew remain alert and that safety is not compromised. Meal opportunities do not need to be curtailed off/private.

COMMENTS ON PREVIOUS FEEDBACKs

Here at CHIRP we very much value your inputs and comments, positive or otherwise. We recognise that there is always room for improvement, and we want to ensure that we are giving you valuable content to support and enhance safety. Please do get in touch at mail@chirp.co.uk and let us know what you think about this edition, or anything else (that's safety related).

“Captain informed the crew member on duty alone at in the FWD galley to expect severe turbulence, but they could not call the crew in the mid or aft galleys to inform them.”

Reports

Report No.1 – Rest arrangements

Report Text: I flew recently on a new aircraft type and I had significant concerns regarding the crew rest arrangements on this type and its impact on crew and passenger communication. The aircraft do not operate long range routes with extended FDPs, however are often found operating with a planned FDP of up to 12 hours.

The main concern I have is that when crew are on rest, there is no access to any interphones at Doors 2 or 4, which is where most of the crew will be found on duty. There is one handset accessible at D1 and one handset each at D3L/R, in the middle of the cabin where no crew are stationed inflight. This is a serious inhibitor to communication between crew in each cabin: I don't feel I need to list the reasons why this impacts negatively on safety.

The Cabin Attendant Panels are located at 2L and 4L, which means no access to lighting controls, call bell indications, dimmable windows etc. IFE and PED power control panels are at 2R and 4R, so they also are not accessible during these times, which means we cannot switch off a customer's PED power if they are asleep with a device plugged in, nor perform IFE resets without waking crew on rest (granted this is a customer service issue but can impact on crew rest and managing fatigue if the crew member resting is continually disturbed).

Further disturbance is inevitable to the crew member resting at D1R, as this is situated in the working section of the galley, in front of the sink and beverage makers which non-resting crew should reasonably need to access between services.

Another issue is the lack of seating for crew on duty during breaks. With up to 3 hours standing in a galley following

the main service before or after a break begins, there is a temptation to sit on canisters which is something my airline does not allow: the fact remains that is not unreasonable to expect to be allowed to sit down at some point in the 5.5-6 hours between take off and your rest break.

This becomes heightened during moderate/severe turbulence, which we experienced during the flight. The captain informed the crew member on duty alone at in the FWD galley to expect severe turbulence, but they could not call the crew in the mid or aft galleys to inform them.

That crew member was able to sit in the inboard rear facing seat at 1L which is not curtained off, however the rest of the crew on duty had nowhere to sit and had to hold on to the galley structure to steady themselves. At 2L and 2R, although there are two seats at each door, only one can be used when the other is occupied during rest as there is a leg rest that stops the 2nd seat from being deployed.

Company Comment: Relevant information should be routinely shared to colleagues on duty, whether that is updates from the flight crew, cabin crew or customer related, for example. In this report, the crew member on duty in the forward of the aircraft did not pass information onto their colleagues following an update about turbulence from the flight crew.

As the reporter acknowledges, the type of flight the aircraft operated did not require FDP (flight duty period) extension. It is therefore reasonable to use the interphones to maintain open communication. Not communicating information such as the flight crew updates about turbulence i.e. not to disturb colleagues on a nutritional break sat on crew seats at some cabin doors with the curtain closed could risk injury to colleagues.

The following guidance will help the reporter when operating on future flights on this aircraft variant:





- **Access to seats in turbulence** – same as on other aircraft (bunked and non-bunked) – on many aircraft there are not the number of seats in the galley area as there are crew working in that galley. Crew can use passenger seats, move to other crew seats when anticipating turbulence becoming worse, etc, and therefore there is no current requirement for there to be the same number of crew seats in a galley as crew working in the galley (also crew in any galley at any one time is a fluctuating number depending on SCCM whereabouts, others helping etc.).
- **Access to SEP equipment/ interphones for emergency** when breaks are taking place – crew can and should enter the seat areas where crew are on break if they need SEP equipment to tackle an inflight emergency, answer an interphone call. The refreshment break of a colleague should not stop them in doing that and they can call crew back from break to help if necessary.

CAA Comment: There are no Cabin Crew inflight rest facilities on this type so FDP cannot be extended as cabin crew will be the limiting factor. This type can only be used for non-augmented crew. The flight would be able to be operated using the maximum daily FDP table under ORO.FTL.205 (b). Regarding accommodation for crew nutrition breaks, the operator is only required to comply with UK Retained Regulation ORO.FTL. 240 (a) & (b), AMC1 ORO.FTL.240 which states that during the FDP, there shall be the opportunity for a meal and drink to avoid any detriment to a crew members performance especially when the FDP exceeds 6 hours.

The operator is required to specify how a crew member's nutrition during an FDP is ensured and to specify the minimum duration of the meal opportunity, but there is no requirement in the regulations for accommodation, comfy seats for these breaks (they are fitted on this type). These seats are an 'extra' and they are not used to increase FDP.

“CHIRP Response”

As previously mentioned, inflight rest is not a requirement to operate this sector, the minimum break required during this duty is a nutritional / meal opportunity break. If the service and timings allow, some operators permit crew on these longer sectors to take a longer rest period, some do not.

It is important that crew have their refreshment breaks, however during a break or rest, safety must remain the priority. Access to interphones, cabin attendant panels etc can still be gained and used discreetly as to minimise the impact on the crew member.

When informed by the captain that severe turbulence was expected, the forward crew member should have called their colleagues to advise them of the expected turbulence (or communicated in line with operators procedures).

During turbulence, as with other aircraft types, crew can occupy any spare passenger seats and any vacant crew seat if necessary to ensure their immediate safety.

“This is not a one-off occurrence it happens all the time and something needs to change before serious accidents happen”

Report No.2 – Fatigued

Report Text: Flight outbound flight was delayed as no cleaners (90 mins) to prepare the plane.

During break the senior disrupted breaks as making noise, moving carts, lights off/on, talking as the break was in a working galley. Landed in (airport) and waited for an hour for our bags and then had to wait for an hour for crew transport. The fatigue started on the return flight.

Left the hotel in the evening UK time, again the flight was delayed 80 mins due to no cleaners on time. We took off early morning UK time, flight time was 8hrs40. As it's a night flight and most passengers are asleep so we don't have much to do and concentrating is very hard and fatigue kicks in enormously. We waited a further 40 mins for a stand then nearly 2 hours for our bags.

This is not a one-off occurrence it happens all the time and something needs to change before serious accidents happen, as we are that fatigued it's unbelievable and no one seems to listen or care. Most airlines have bunks or allow crew to sit on the back pax seats to have a quiet rest but at my airline it's not allowed and to have a break in a working galley where everyone is banging carts in and out, talking, serving passengers etc.

By the landing I am constantly fighting the fatigue even after I have rested the night before.

Company Comment: All flights are operated within the FTL scheme as approved by the U.K. CAA and contained within the Operations Manual. This FTL scheme does not include any provisions for the extension or management of FDP by virtue of in-flight rest as our aircraft are not fitted with in-flight rest facilities as would be required to meet regulatory compliance requirements for this purpose - accordingly in-flight rest is not a feature of our current operation.

We operate a Fatigue Risk Management program which incorporates regular Fatigue Safety Action Group (FSAG) Meetings and includes fatigue analysis of the planned and flown roster using fatigue management software. All inputs to the Fatigue Risk Management program are openly reviewed at the FSAG meetings. We are satisfied that the program is operating effectively to monitor and manage any fatigue related issues.

CAA Comment: The flight time would not require in-flight rest therefore can be operated under the daily maximum FDP table as stated in UK Retained Regulations ORO.FTL.205 (b).





Regarding flying during the WOCL under UK Retained Regulations CS.FTL.1.205(a) (2), the operator is required to apply appropriate fatigue risk management to actively manage the fatiguing effect of night duties of more than 10 hours in relation to surrounding duties and rest periods.

“CHIRP Response”

The disturbance of crew on refreshment/nutritional breaks should not hinder a crew member's ability to continue to operate as inflight rest is not required to complete the duty. However, just because a duty is legal, it does not mean that you may not find the duty tiring, please visit [Self-help tips to fight tiredness - NHS \(www.nhs.uk\)](https://www.nhs.uk) for some self-help tips to restore your energy levels.

Because its experience and perception are so subjective, there is no one definition of tiredness/fatigue. Most operators have a FRM (Fatigue Risk Management) programme which specifically monitors fatigue reports, if your company has a FRM programme utilise it and report your tiredness/alertness.

Reporting your safety concerns/issues (including fatigue) to your company allows them to identify potential issues so that they can monitor trends, review rosters and take timely action, if necessary.

Manpower issues have been affecting staff on the ground, security, customs, cleaners, caterers, drivers etc, this unfortunately is having an impact on crew with the knock-on effect of delays.

Hopefully, as the peak of Omicron subsides and additional staff are recruited by ground handlers etc. delays will improve. Please remember to report these concerns internally too, if an operator needs to approach an airport handling company for example, then reports support this.

Report No.3 – Operated unfit due to fear of repercussions

Report Text: Prior to this flight I had slept for only an hour at maximum due to insomnia, the company do not allow us to use sleeping aids so only natural remedies were available. When waking up for my flight I knew I was unfit and struggled to get myself ready as I had very slow cognition, I drove to work but cannot remember driving.

I spoke with my partner about not being fit to work he also felt that I should call unfit, I told him I wouldn't as I would have to explain why I was unfit and that if investigated they would see my roster was not fatiguing and that I had requested unpaid leave on this day (due to it being an early flight and the trouble to sleep).

I made the crew aware that I was very tired and may need some prompting if I forget something, another crew member stated that she had operated with an ear infection this week due to fear of repercussions and investigation.

After the in-flight services I sat down to eat and very nearly fell asleep, I decided to walk up and down the cabin to keep myself awake, later on in the flight I became upset in the toilet due to being so tired and frustrated.

The recent management changes have hugely impacted the safety culture we used to have at my airline, we do not have it anymore it is purely a profitability culture. There are many cabin crew who openly admit to operating unfit due to fear of discipline and being high risk for redundancy should another round happen.

Company Comment: We have a strong Just Culture and encourage reporting of all safety concerns, including those relating to sickness and fatigue. All crew members have a personal responsibility to report rested and fit to complete their duty, flying when not fit to do so may lower safety standards onboard, and could put the individual at risk including on the drive to or from work.

Fatigue risk is managed and assessed by an independent specialist team within the safety department, and outside the line management structure, and this allows for expressing concerns regarding a future roster. Information on how to report actual or potential fatigue, no matter what the cause, forms part of initial and recurrent crew training.

Similarly, leave requests are administered by a different team to sickness absence and so the reporter's manager is unlikely to have been aware of their unpaid leave request.

We have various methods of reporting any safety issues, including confidential options, and we also have open lines of communication to management teams, and various support options available. We would strongly encourage the reporter to speak to their management team or the safety team so that we can support them as appropriate to their individual needs.

CAA Comment: Under the UK Retained Regulations ORO.FTL.115 (Crew members responsibilities) if a crew member knows or suspects that he/she is suffering from fatigue or feels otherwise unfit should not perform duties on an aircraft. This crew member should have reported fatigued and completed a fatigue report form.

Organisations and all individuals associated with aviation tasks have a responsibility in maintaining a healthy safety reporting culture. Safety Systems should identify risks posed to that operation and promote awareness of these to all personnel via established reporting protocols. The Reporting System should be fully utilised and emphasise 'just culture'.

“Organisations and all individuals associated with aviation tasks have a responsibility in maintaining a healthy safety reporting culture”





“CHIRP Response”

Flying can be tiring; long days, busy flights, early reports, delays, personal issues etc can all cause tiredness and potentially fatigue.

Fatigue can be a result of trying to manage a work and life balance and just because a duty is legal, it does not mean that you might not suffer from the effects of tiredness and potentially fatigue.

Let your operator know if you are having issues sleeping and/or you require any additional support. Please also remember that you have a responsibility to yourself, to ensure that you aren't putting yourself at risk by driving when you haven't slept the night before.

Ultimately, crew should not be reporting for duty when they are unfit. The negative consequences of reporting when you are unfit should not be underestimated. There are potential implications not just for you and your health (being stuck down route when you are unwell is not a pleasant experience), but also to your colleagues (whose workload has now potentially increased) and the passengers, if there is delay or cancellation of your flight.

It was proactive of the reporter to request unpaid leave when they knew they'd struggle with rest before an early flight. However, from a reporting perspective it would've been better to have followed the operators advance fatigue reporting process, if there is one.

Familiarise yourself with your operator's process so that you are aware of the options available to you should you find yourself in a similar position. Fatigue must be reported internally as data from safety reports helps an operator identify and mitigate a safety concern that could be occurring.

“Fatigue must be reported internally as data from safety reports helps an operator identify and mitigate a safety concern that could be occurring”

The CHIRP Aviation Programme also provides a facility for confidential reporting of Bullying, Harassment, Discrimination and Victimisation (BHDV) where there is an identifiable safety-related concern. CHIRP has no specific expertise or resources to investigate BHDV reports. CHIRP's role is to aggregate data to build a picture of the prevalence of BHDV in the aviation sector. See our [BHDV page](#) on the CHIRP website for further information. Initially, BHDV reporting will be rolled out as a 6-month pilot-programme for Flight Crew and Cabin Crew only. The remaining sectors of aviation (ATC, Engineering, Ground Handling etc) will be included once the pilot-programme has been reviewed and any lessons incorporated (likely to be in April 2022).

CHIRP

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CHIRP

Confidential Human Factors Incident Reporting Programme

What is CHIRP?

CHIRP is a UK charity that provides the UK's independent confidential reporting programme for aviation safety-related incidents and concerns. The programme provides a way for people to report things when they don't know where else to do so or when they wish to make a report without being identified to others. When making a report to CHIRP, personal details are not shared with any other organisation or person. Confidentiality is our watch-word and we only pass on disidentified information to other organisations with the agreement of the reporter when we conduct investigations. Your disidentified report will be reviewed by an Advisory Board of eminent aviation peers who provide independent and impartial advice and counsel to the CHIRP staff. Important information gained through reports, after being disidentified, is also disseminated as widely as possible through our FEEDBACK newsletters and website with the aim of improving safety standards and educating others.

Who can report?

Anyone closely involved in the operation, maintenance or support of aviation. This includes holders of Student/Private/Commercial pilot licences; cabin crew; glider, microlight and paraglider pilots; drone operators; parachutists and balloonists as well as maintenance/manufacturing engineers, ground handling/security staff and controllers/FISOs etc.

When do I report?

Submit a report when you wish others to benefit from an important "Lesson Learned"; when other reporting procedures are not appropriate or are not available; when you are concerned to protect your identity (please note that anonymous reports are not accepted); or when you have exhausted company/club/regulatory reporting procedures without the issue having been addressed to your satisfaction.

How can I report?

The primary way of submitting a report is through our website at www.chirp.co.uk. On selecting the online reporting feature, you will be sent a link to our reporting portal where you will be invited to enter appropriate details in a series of data fields. You can enter as much or as little information as you wish but the more you give, the better we are able to assist. Although online reporting is the most efficient and effective way of submitting a report, you can also make a report by email to: reports@chirp.co.uk, by phone to: 01252 378947, or by mail to: CHIRP, One Kingdom Street, Paddington Central, London, W2 6BD.

What do I report?

Report safety-related incidents or concerns involving yourself, other people, your organisation or organisations you deal with. Incidents and concerns can include:

- errors and mistakes
- individual performance
- operating, maintenance or support procedures
- regulatory aspects
- unsafe practices

What do I not report?

CHIRP cannot become involved in:

- incidents or events with no safety content
- issues involving conflicts of personalities
- industrial relations problems
- legal or commercial disputes

