

ATC833

Posted on 31.10.2023 by Steve Forward

Category: [Air Traffic Control](#)

Report Title Rest-period tasks

Initial Report

With the removal of SRATCOH [as a result of the introduction of [CAP670 Part D](#)], I feel that the issue of additional tasks taken on during breaks is not well regulated. Our unit has introduced their own rule stating that *"ATCOs may undertake additional tasks during their breaks, including meetings, if such tasks do not cause mental or physical fatigue"*. Due to chronic staff shortage (which is unlikely to improve in the near future) there is virtually no facility time available so this modification appears to have been introduced to allow administrative tasks to be completed despite the lack of staffing. Until a task or meeting has been completed how will an ATCO know whether it has caused mental fatigue? Also by this point you will be scheduled to recommence providing live operational duty. If you then declare yourself as fatigued, it is likely that an operational position will have to close. At a small airport such as ours this can lead to a full closure of the airport and this can cause you to feel obligated to continue working. I feel this modification has been introduced for the sole benefit of the management and to the detriment of the operational staff.

My major concern caused by the introduction of this rule is the ability of our management to try and cover the shortfall in our staffing by making those of us left carry out all the required administrative tasks while "on duty" but within our breaks from the operational position. Our management say there isn't a problem because the instruction only says *"MAY carry out additional tasks IF they don't cause mental or physical fatigue"* but you won't know if you feel fatigued until after the meeting/administrative task and that will be just as you are about to resume live operational duties.

Comment

UK CAP670 Section D is largely silent on what may or may not be done during breaks other than to give broad guidance on what should constitute a 'Break' in itself as in Para D27 below.

CAP670 Part D Para D27: "Breaks shall include all measures necessary to ensure that controllers will not be suffering, to any extent as a consequence of their duties, mental or physical fatigue whilst exercising the privileges of their licence. Such measures are expected to include a certain detachment from the operation, e.g. rest areas, some of which shall afford the individual 'quiet space' and facilities for adequate refreshment."

Part of the problem is that administrative staff who had previously dealt with many of these tasks are often now no longer employed at many units due to resource constraints and so increased burden and pressure is falling on controllers to manage and conduct additional administrative activities in addition to their core workflow. As a result, there are undoubtedly additional tasks that need to be done by controllers but they should not necessarily be expected to do so during breaks. Moreover, extraneous tasks that are not required for regulatory purposes should be shed, and ANSPs should review the remaining administrative/ancillary tasks that they are expecting controllers to do during breaks to evaluate the risk/benefits so that everyone is clear as to their likely demand. These risks/benefits and safety justifications should be transparently stated and continually reviewed as part of the unit's change management process so that controller activities and fatigue levels are appropriately monitored.

CHIRP has previously reported on similar concerns about additional tasks that might cause a conflict with SRATCOH in July 2020's [AT FEEDBACK Ed 135](#), Report 13 where we stated:

"Whilst SRATCOH provides guidance on duty hours, the critical factor is whether controllers are actually feeling fatigued. Any mandated non-control duty counts towards the ten hours SRATCOH limit, but some meetings are considered voluntary and therefore do not technically affect SRATCOH. Irrespective, it is essential that an ATCO removes themselves from duty and report instances of fatigue whenever they occur. That being said, it is more prudent to prevent the situation in the first place, and use the guidance provided under SRATCOH to help avoid known situations where fatigue can become an issue. If extra duties are to be carried out in addition to a full operational shift, then it would be better to do these extra duties after the operational part of the shift, rather than before – some units reduce the finish time for afternoon/evening shifts if meetings are conducted in the morning, and allow the option of attendance or not for afternoon meetings if morning shifts have been carried out. Ultimately, an ATCO is fully within their rights to refuse to attend any meeting prior to a full ATC shift."

The CAA commented in Ed 135 that completing additional tasks such as this was voluntary and so it was up to controllers to either accept them or decline. That is easy to say in theory no doubt, but somewhat harder to do in practice at small units where resources are constrained and some additional tasks simply have to be done to ensure the smooth operation of the unit.



