

Project Palamon: Progress Update - February 2022

21 February 2022

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NATS

Context

In our response to the CAA's Final Decision on Project Palamon (CAP2100)¹, we committed to provide six-monthly updates on the actions being progressed to address the 7 recommendations set out in the Final Decision. This is the first update to the CAA. NERL has progressed the accepted recommendations as detailed in the response. In developing this update, NERL has reflected on the content of the CAA's response² to NERL's August 2021 report, and in particular the CAA's positive views on NERL's proposals.

Summary of Progress

In its formal response to the CAA (August 2021), NERL committed to increase staffing resilience of services within the London TMA, by increasing both the headcount and number of validations held by controllers and to identify ways to deploy them in a more flexible manner and to train them more efficiently; this update sets out the progress that has been made on these areas. Airspace Development (AD) 6 remains on track to be delivered on 24th February 2022, which will increase airspace capacity to better service demand to traffic operating at London Luton and London Stansted whilst improving the level of safety provided. Our commitment to better engage customers has been progressed, including the establishment of multilateral "customer look-ahead calls" to facilitate the two-way sharing of information. These calls include the review of general delay attribution events, with delay attribution for individual airspace progressed on a bilateral basis. NERL is now reporting service performance outcomes on a quarterly basis, including performance against the Oberon indicators. NERL remains on track to provide the updated staffing resilience plan in August 2022, which will take into account the feedback received from the CAA, airlines and airport stakeholders on the August 2021 plan. Detailed updates on the 7 recommendations are provided below.

Update on the Recommendations

NERL's progress with respect to the 7 recommendations made by the CAA is summarised below.

1. Staffing Resilience

Controller headcount and the number of validations have continued to increase since our August 2021 response, in line with our ongoing training plan and prioritisation of this activity in the Terminal Control (TC) operation. As of the end of January 2022, the number of validations supporting the Approach Control functions of the London airports (compared to Summer 2019) were: Heathrow 42 (43), Gatwick 35 (30), Stansted 34 (26), Luton 32 (24) and London City 31 (31).

¹ CAA, Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, 25th February 2021

² Letter from Paul Smith to Juliet Kennedy dated 17th November 2021.

The focus has been maintained for on-the-job training (OJT), for both *ab initio* trainees and those gaining additional validations in the Stansted and Luton Group, while in addition, operational conversion training (OCT) has been delivered in parallel to all qualified controllers affected by the implementation of the AD6 airspace change in February 2022.

In support of the effort to increase headcount and validations, initiatives have been and will continue to be developed under the theme of flexible deployment to better enable staff to be trained and/or to train others. These are in combination with initiatives to increase the efficiency of training delivery. The sections below outline the progress made to date.

Use of simulation

In response to Covid-19 and the resulting very low traffic volumes, a simulation programme was developed and delivered to ATCOs to support their extension training to gain additional validations. Previously we relied predominantly on training in the live environment.

Although the Unit Training Plan (UTP) includes the use of simulation facilities, the use of diverse evidence to assess progress through the training phases has since been expanded where appropriate to incorporate full simulation and Part Task Trainer (PTT – lower fidelity simulation) activities. In conjunction, the Unit Competence Team has been engaged to agree any support activities required by individuals after their validation. Our approach to using simulation to supplement and enhance unit training continues to be refined as we understand the benefits of such an undertaking. It has been incorporated into our extension training plan for 2022.

Through close collaboration with CAA SARG (Safety and Airspace Regulation Group), we noted in our previous submission that some validation boards had been conducted in the simulated environment. Further use of simulation to support validation boards remains an option, although increases in traffic have meant this had not been required in the latter quarter of 2021.

Enhancements have been made to the PTT facility at Swanwick which have focused on maximising the current platform capability. A project is underway to define future requirements for this facility and how this could be expanded across the NERL estate. Given the importance of ATCO training both now and throughout NR23, our plan submission for the Reference Period contains a proposal for £15m funding to invest in our training and simulator capability. This will enable us to reduce our dependency on the live environment, which would further assure our training pipeline, provide greater agility to adapt our supply to meet material changes in traffic, and reduce the duration and cost per trainee.

Joint Validations following Airspace Development 6 implementation

NERL's En Route management team has been exploring an opportunity suggested by the Trade Union, as part of bilateral discussions on responding to Palamon, that following AD6 implementation, Stansted and Luton approach could be jointly trained as initial validations for *ab initio* controllers.

It is intended that the planned Unit Endorsement Course (UEC) in June 2022 for Stansted and Luton will cover both endorsements concurrently in the simulated pre-OJT phase, thus allowing maximum flexibility during OJT across both sector groups. During the OCT for AD6, a number of elements will be agreed between Training and the operational teams for the structure of the training plan for gaining joint initial validations ahead of submission to SARG in early 2022 for the revised UEC.

The targeted benefits of gaining both validations at the same time include:

- Increased resilience immediately upon validation.
- Reduced future training demand, as extension training for the second validation will no longer be required.
- Reduced overall training time, due to the co-located nature of the sectors and the greater understanding of the wider task that undertaking training on both concurrently should provide.
- Greater assured and more flexible training delivery, with a wider pool of on-the-job training instructors (OJTIs) available with both sectors being trained.

Operational staff deployment

NERL has been developing options with its Trade Unions to deploy operational staff more flexibly to improve access to training. This is in support of the previously described initiatives aimed at improving training efficiency and to help maintain the resilience and flexibility of the operational workforce over time.

Joint workshops were held to determine an expansive list of ideas for further exploration. An update on the items prioritised to take forward at this time is provided below. As further initiatives evolve, they will be included in future updates.

Standardisation of Procedures

Standardisation and where possible simplification of the procedures for operating the Approach functions was identified as beneficial for enabling controllers to train for additional sector validations more easily.

Work is underway to align each Approach function's Manual for Air Traffic Services (MATS Part 2) with the corresponding Tower function's MATS Part 2. Initially, ATCO Subject Matter Experts are undertaking side-by-side comparisons of the Approach and Tower sections within the MATS Parts 2 to identify differences and any opportunities for improvement. Once each individual "Approach to Tower" assessment has been completed, an overall review will be undertaken to understand the opportunities to standardise between the five Approach Control functions.

Workshops are being convened with NERL and the Airport's teams for each Approach/Tower pair to raise findings and agree timelines to update the affected MATS Parts 2. The workshops are timetabled to occur throughout 2022 and are targeting conclusion by the end of the year.

Restructuring to dedicated functional directorates

At the end of 2020, NERL Operations underwent a significant restructure, moving from a geographical operating model aligned to the Swanwick and Prestwick centres, to a functional model focused on delivering "One Operation".

As a result of this restructure, a single Operations Training directorate was created, accountable for the end-to-end training of ATCOs, as well as Operations Planning and Resource, a single directorate accountable for the workforce planning and rostering and deployment of NERL operational staff.

Embedding this structure has required a thorough review and in some cases redesign of processes and accountabilities to maximise benefits from the new model. Where practical TC Approach has

been used as the pilot for new or improved methods to realise benefits in this operation at the earliest.

As part of developing and rolling out a new aligned rostering service for NERL, which exploits the functionality of the Quintiq rostering system, TC Approach is currently piloting a more targeted pairing of trainees and instructors in the roster build process up to three months ahead of delivery. This better protects the priority activity as the roster inevitably evolves e.g. with sickness, loss of licence etc, as well as increasing the time and scope to satisfy competing requests for the resource.

We have also reached agreement through the joint workshops with the Trade Unions to allocate Additional Duty Days (ADDs) to support training, reflecting the priority this activity is given compared to other demands on controller resource. This additional day will be used in the simulator, with the rostering and operational teams identifying the most appropriate time to schedule these for operational efficiency.

Ongoing monitoring of initiatives

We are keen to assure ourselves and our stakeholders of the effectiveness of our efforts to increase staffing resilience. As well as continuing to monitor headcount and validations, we are developing measures to assess our progress in creating and making use of additional capacity to train and be trained.

2. Airspace Change

The Swanwick Airspace Implementation Project Airspace Deployment 6 (SAIP AD6) achieved two major milestones in November 2021 which contribute significantly to realising closure of Recommendation 2.

Firstly, the Secretary of State for Transport formally notified the CAA that the Airspace Change Proposal (ACP) would not be “called in”, thereby vesting the approval decision with the CAA. This was followed at the end of November by formal notification from the CAA to NERL and London Luton Airport Limited of its decision to approve the SAIP AD6 ACP. The CAA’s approval of the ACP enabled NERL to submit the United Kingdom Aeronautical Information Publication (UK AIP) changes on 26 November to notify the detail of the airspace change to the aviation industry, so that it can be implemented on 24th February 2022, as planned.

The SAIP AD6 Project is now preparing for transition and the implementation of those changes, including ATM system updates, ATC procedure finalisation, network management considerations and delivery of the Operational Conversion Training (OCT) to operational staff. The latter involves 1,666 separate training activities including computer-based training, briefings, and real time simulation training exercises to ensure all operational staff affected by the change are prepared and qualified to support the new operational procedures from 24th February 2022. OCT commenced in October and is progressing well. This has been a major focus for the business and has been a top priority along with providing a safe and efficient service to our customers, set within the context of the pandemic and associated challenging staff picture.

In summary, the SAIP AD6 Project is making positive progress towards delivery of the airspace change in the region that closely supports future operations at London Luton and London Stansted airports. It is on track to deliver the targeted safety and service performance benefits.

NERL anticipates conducting a post implementation review of AD6, commencing in the first quarter of 2023, and plans to share the findings with the CAA and other stakeholders via existing consultation and communication processes, such as the Service and Investment Plan.

3. Engagement with Stakeholders

NERL has re-established “customer look-ahead calls”, which take place on the last Thursday of each month. These forums, held multilaterally and open to all customers, are a key part of our engagement with customers as the routine touch point for the two-way sharing of all operational information for the month ahead, including updates from NERL, Met Office, airports and airlines. This look-ahead session acts as the key engagement opportunity for all information and strategic discussions with our customer group on operational issues or concerns for the following month.

We have noted good levels of attendance, engagement and feedback from these sessions, which, coupled with the ability to record and store the meeting, have created the ability to reach more customers than before with the key operational information they need.

In addition to these monthly meetings, we have been conducting more frequent bi-lateral meetings with our customers to discuss specific customer aspects and to enable us to work collaboratively as we navigate the regeneration of traffic following changes to travel restrictions. These bi-laterals provide a forum to review previous operational performance, to discuss any specific issues or delays, and to plan for the future.

We have taken advantage of using MS Teams which makes customer interaction much more accessible, enabling more dynamic and frequent engagement, creating an ongoing, open dialogue.

In order to support robust planning for the anticipated demand in Summer 2022, NERL continues to request airline schedule information at the earliest opportunity to provide our forecasting team with the most up to date and accurate information for our planning purposes. These requests form part of the ongoing bi-lateral conversations.

4. Coding of Air Traffic Control Delay

NERL continues to follow the requirements within the Eurocontrol Network Manager (NM) Air Traffic Flow and Capacity Management (ATFCM) Operations Manual. We monitor our delay code attribution internally on a weekly basis and all delay codes are assessed for accuracy by Eurocontrol. In addition to the published performance report (Condition 11), NERL will offer an increased frequency of updates for delay attribution through the Customer engagement opportunities described in our response to Recommendation 3. The monthly look-ahead will be the mechanism for the review of general delay attribution events and the airline specific bi-lateral meetings will provide delay attribution information for individual airlines.

5. Sector information to Eurocontrol

NERL continues to meet the objective of this recommendation. NERL provides the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

6. Performance Data

As air traffic began to recover during the second half of 2021, NERL agreed with the CAA that it would revert to quarterly reporting of the performance report (previously known as the Condition 11 report), reporting on the period July – September and October – December separately, providing more frequent updates on NERL's operational performance. In addition, it has been agreed with the CAA that the Oberon indicators now form part of this performance report, creating more concise performance reporting. The performance reports (along with a wide range of other information of interest and relevance to customers) are published on NATS' customer gateway at www.customer.nats.co.uk.

7. Reporting on Resilience Planning

This first of our six-monthly reports meets part of the CAA's recommendation 7, to report on progress in maintaining a resilient service through adequate supply of operational staff across our network, as well as on steps to enhance airspace capacity and to engage more effectively with airline customers and airports on operational performance. We will meet other parts of the recommendation in the updated staffing resilience plan, produced on an annual cycle, with the next version scheduled for August 2022. In producing that document, we will take into account the feedback from the CAA and from airline and airport stakeholders on the August 2021 staffing resilience plan.

In addition to this reporting, we have engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27. This includes presenting evidence on the projected range of demand for en route service as traffic levels are forecast to recover, versus the projected range of supply, as well as implications of traffic levels and the scale and pace of capital investment for service outcomes (in terms of delay and flight path efficiency). We have also discussed with customers options for investing in more simulator training capacity, to enhance the agility of our operational training for ATCOs and thereby enable us to respond more quickly to emerging demands across the UK ATM network. Further supporting evidence on these issues will be presented as part of our NR23 business plan submission.