

2 September 2021

Policy Statement

CAA Policy on Air Traffic Controllers' Rostering System(s)

1 Introduction

- 1.1 ICAO Annex 11 requires States to establish regulations for the purpose of managing fatigue in the provision of air traffic control (ATC) services¹. It permits States to choose whether to develop regulations that prescribe scheduling limits or to authorise air traffic services providers to use a fatigue risk management system (FRMS) to manage fatigue.
- 1.2 [Regulation \(EU\) 2017/373](#) as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 lays down common requirements for providers of air traffic management (ATM) / air navigation services (ANS) and other air traffic management network functions and their oversight. This Regulation may be cited as the ATM/ANS Implementing Rule (IR).
- 1.3 Annex IV 'Part-ATS' to the (UK) ATM/ANS IR requires ATC service providers to develop, implement and monitor a rostering system in order to manage the risks of occupational fatigue² of air traffic controllers through a safe alternation of duty and rest periods³. This requirement is linked to and dependent upon a further requirement⁴ placed upon ATC service providers to:
 - (a) develop and maintain a policy for the management of air traffic controllers' fatigue; and,
 - (b) provide air traffic controllers with information programmes on the prevention of fatigue, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to UK Reg (EU) 2015/340.
- 1.4 These legislative requirements and the associated acceptable means of compliance (AMC) and guidance material (GM) published by the CAA meet the ICAO Annex 11 requirement for regulations that prescribe scheduling limits. At present, the UK has not authorised air traffic services providers to use a FRMS.
- 1.5 ICAO Doc 9966 '[Manual for the Oversight of Fatigue Management Approaches](#)', and in particular the '[Fatigue Management Guide for Air Traffic Service Providers](#)' provide useful insights into the critical elements contributing to ATCO fatigue as well as guidance on fatigue management approaches supported by ICAO Standards and Recommended Practices.

2 Background

- 2.1 The Scheme for the Regulation of Air Traffic Controllers' Hours (SRATCOH) was introduced in the UK in 1992 as a means to address concerns that some air traffic

¹ ICAO Annex 11 Section 2.28.1.

² 'Fatigue' means a physiological state of reduced mental or physical performance capability resulting from sleep loss or extended wakefulness, circadian phase or workload (mental or physical activity, or both) that can impair an individual's alertness and ability to safely perform his/her tasks. (UK (EU) Reg No 2017/373 ATM/ANS IR Annex I (48))

³ ATM/ANS IR Annex IV Part-ATS ATS.OR.320(a).

⁴ ATM/ANS IR Annex IV Part-ATS ATS.OR.315.

controllers were working excessive hours, and that some shift patterns in-use could induce fatigue.

- 2.2 The purpose of SRATCOH was to ensure, so far as is reasonably possible, that controller fatigue did not endanger aircraft and thereby to assist controllers to provide a safe and effective service. In doing so, SRATCOH defined a number of 'limitations' relating to, for example, maximum periods of duty and the intervals between those periods of duty. Whilst some ATC service providers were granted 'local modifications' to these limitations, SRATCOH remained a prescriptive system, published by the CAA, that providers were required to comply with. This contrasts with the requirements in (UK) ATM/ANS IR Annex IV ATS.OR.320 for ATC service providers to define these limitations for themselves.
- 2.3 However, ATS.OR.320 indicates that the selection and regular revision of the structure of the rostering system, and of the values (or limitations) used therein, should be based on scientific principles, data gathered by the ATC service provider and best practices⁵. Whilst some UK ATC service providers can readily gain access to the appropriate resources to support this task, the CAA is cognisant that this may not be the case for all. Moreover, the AMC and GM published by the European Union Aviation Safety Agency (EASA) to accompany ATS.OR.320 provide limited provisions to inform the work of the ATC service provider in defining these limitations.
- 2.4 On 31 December 2020, the CAA adopted the EASA AMC and GM as its policy with regard to compliance with the relevant EU law that has been retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018. As such, the CAA is able to amend these AMC⁶ and, in order to support ATC service providers in complying with the ATM/ANS IR Annex IV requirements, has developed additional AMC and GM to supplement, and in one case replace that provided by EASA.
- 2.5 These AMC and GM use the values and limitations detailed within SRATCOH as their foundation and provide definitions and associated limitations that ATC service providers may use to form the basis of the elements of the rostering system required by ATS.OR.320(a). Where an ATC service provider uses the values provided within the UK AMC and GM as the basis for their rostering system, the CAA would not expect the ATC service provider to provide additional scientific justification or data to evidence the adequacy of that system.
- 2.6 By definition, AMC are non-binding standards and ATC service providers may propose alternative means of compliance (MOC)⁷ to those adopted by the CAA in order to establish compliance with ATS.OR.320. Where an ATC service provider identifies the need to operate in a way that differs to the AMC (for example, the structure of or values used within their rostering system), they may follow the process to develop and propose alternative MOC for consideration and approval by the CAA.

3 The Rostering System

- 3.1 ATS.OR.320(a) requires the ATC service provider to specify a number of elements within their rostering system. AMC and GM to inform an ATC service providers specification of these elements is contained on the CAA's [UK Regulations](#) website and the ORS9 Decision

⁵ ATM/ANS IR Annex IV Part-ATS GM1 ATS.OR.320(a).

⁶ 'Acceptable means of compliance (AMC)' means non-binding standards adopted by the competent authority to illustrate means to establish compliance with Regulation (EC) No 216/2008 and its implementing rules (UK Reg (EU) No 2017/373 Annex I Part-Definitions).

⁷ 'Means of compliance (MOC)' means those means of compliance that propose an alternative to an existing AMC or those that propose new means to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the competent authority (UK Reg (EU) No 2017/373 Annex I Part-Definitions). See also ATM/ANS IR Annex II ATM/ANS.AR.A.015 and Annex III ATM/ANS.OR.A.020.

enabling these AMC and GM is on the CAA's 'Publications' area of the website under [Official Record Series 9](#).

- 3.2 The purpose of the roosting system is to manage the risks of occupational fatigue of air traffic controllers, in order to ensure, so far as is reasonably practicable, that controller fatigue does not endanger aircraft and assists air traffic controllers in providing a safe and effective service. In all cases, the management of controller roosting should be sympathetic to this purpose and where there is any doubt as to the application of this guidance, advice should be sought from the appropriate Principal Inspector ATM.
- 3.3 ATC service providers shall document their roosting systems within unit documentation and ensure that any changes or amendments to the roosting system are managed and submitted to the CAA in accordance with their approved change management procedures. In evaluating a proposal submitted by an ATC service provider, the CAA will have regard to:
- (a) the amount, type and complexity of recent and anticipated traffic handled by the unit and position concerned;
 - (b) the published operational hours of the unit;
 - (c) the pattern of shifts in operation at the time of any shift involved;
 - (d) the qualifications and availability of support and supervisory staff;
 - (e) exceptional temporary staffing problems;
 - (f) the equipment in use at the unit;
 - (g) exceptional temporary equipment problems;
 - (h) the type of operating position at the unit;
 - (i) factors which may compensate for, or benefits which may arise from, any modification; and
 - (j) such other matters as the CAA considers to be relevant.
- 3.4 ATC service providers shall notify the CAA of formal roosting arrangements of a repetitive nature only once. However, details of the roster actually worked showing variations due to unforeseen circumstances may be required at the discretion of the CAA, particularly where there is a slight shortfall of staff and overtime is likely.
- 3.5 ATC service providers who are unable to set a regular pattern of attendance for ATCOs shall, on request, supply to the CAA a copy of the prepared roster at least 30 days before it is due to come into force, together with details of each month's, or each four-week period's, roster actually worked.
- 3.6 At short notice, and in exceptional circumstances, the ATC service provider may, at its discretion, modify any limitation relating to their roosting system through persons exercising its authority. Such modifications may only be made to overcome short-term, temporary and unforeseen difficulties at the unit and, having regard to the limitations described within the roosting system, may only be made if the safety and effectiveness of the ATC service will be maintained.
- 3.7 The CAA will require to review the circumstances of each such short notice modification. For this purpose, ATC service providers shall use form [SRG 1410 'Exceeding the limitations of a roosting system'](#) to report the details of the modification within 24 hours of it taking effect.