

PE1804/EE

Anonymous submission of 7 December 2020

I am an Air Traffic Control Officer (ATCO) employed by HIAL therefore I wish to make my submission anonymously for fear of retribution.

The HIAL ATMS was initially trumpeted as being solely focussed on Safety. It was not long however, before Safety was replaced by Recruitment and Retention as the main driver for change. This argument has been discredited so the newest driver appears to be Resilience. Indeed, Safety was pushed down to fifth or sixth on HIAL's list of priorities in an early presentation.

All ATCOs recognise the need for modernisation of ATC. The constant mantra of HIAL management is, "doing nothing is not an option". A phrase trotted out by the Transport Secretary whenever challenged. This is something we agree on. However, I believe, choosing the riskiest, costliest option outlined in the Helios report should not be the option of choice considering the other options available. The Helios report has been referred to by senior ATMS project managers as being a "poor" report (stronger terms have been used) but it served its purpose, it recommended the desired outcome, and we are told there is no point revisiting the report and pointing out discrepancies/inaccuracies/failings.

The Sumburgh model of having aerodrome controllers at the airport with controlled airspace and approach surveillance provided by radar controllers on the mainland surely satisfies the requirements of modernisation throughout the company. This option was listed in the Helios report but is consistently ignored. This option satisfies the provisions of the Islands (Scotland) Act 2018 by retaining jobs and families in the local communities rather than forcing staff to relocate or lose their jobs and the subsequent loss of employment opportunities for future generations. HIAL have stated that they had no legal obligation to carry out an Islands Impact Assessment. They certainly would have preferred not to have carried one out. However, they have openly stated that regardless of the findings of the assessment, they will not change course.

Why on earth would experimental technology be trialled across the Highlands and Islands when it is simply not necessary? To rely on connectivity and technology to withstand the challenges of remoteness and weather when dealing with people's lives is, I believe, a recipe for disaster.

The initial intention of the ATMS was for seven airports to be centralised, controlled airspace was to be established, and surveillance was to be implemented. The company have already failed in this stated objective. Only five airports remain in the ATMS project. The surveillance solutions initially decided upon have been found to be unsuitable and the establishment of controlled airspace is not proving to be as easy as promised to those making the decisions on approvals and funding.

Inverness Airport's application for controlled airspace has still not been approved nearly eight years after the framework briefing was held with organisations considering proposal of the change. Are the timelines for controlled airspace feasible and realistic within the budgets outlined when one considers the Inverness timeline?

The downgrade of Benbecula and Wick was never an option even considered during the proposals put to the HIAL Board for approval. I understand that the decision to downgrade was made without any input from the airport staff. There was no safety case. There was no hazard identification. There were no risk assessments. It appears to have been decided based on annual movements alone.

HIAL have labelled the downgrade as a transition but make no mistake, it is my belief that this is a downgrade to the service provision that the communities expect and demand.

ATCOs provide a standard separation minima between aircraft. This is something an AFISO can not provide. Aircraft are permitted to fly as close to each other as they wish under the auspices of a “basic” service as opposed to the “procedural” service provided by ATC.

If any of the applications for controlled airspace at the five airports still featured in the centralisation project are unsuccessful, will these airports be downgraded to AFISO units too?

Loganair management speak very highly of the proposal to centralise ATC and have no concerns about the downgrading of two airports. One might think they were flying the aircraft themselves. However, having spoken to several Loganair pilots on these issues, they have confirmed that a full survey of pilot opinion has never been undertaken.

It is incredible that as part of this Air Traffic Management Strategy which initially set out to improve safety and reduce Airprox events, HIAL have seen fit to approve a downgrade which will diminish safety margins at two out of seven ATC airports. In his submission, the Transport Secretary ends by suggesting, “the committee may wish to consider engaging with the CAA... given their role in ensuring that the new system will be as safe or safer than existing arrangements.” Surely HIAL should have done this by now, never mind the committee. And is the downgrade of two airports as safe or safer than the existing arrangement?!