## PE1804/G

Prospect submission of 28 October 2020

Prospect supports the petition submitted. It has been the view of members since the project was first mooted that a centralised solution is the wrong option for HIAL on technical grounds, service delivery and for the impact on them and their families. These views have been put to HIAL at every stage. Frequently decisions are taken at a HIAL board level with no prior consultation and little or no consideration for the impact on the workforce and their communities.

Members have raised a host of technical issues with the proposed solution including human factors, multi-unit validation issues, and the physical limitation of a camera-based solution. For example, it is difficult if not impossible to position cameras to cover all three runways at Sumburgh Airport in Shetland. These concerns have not been taken seriously - the company simply says that the regulator "will not approve an unsafe system". This is a gross oversimplification of a far more complicated safety environment. While the regulator may deem a project safe or unsafe, they will only give final sign off after extensive testing at which point significant public resource will have been committed making it harder to revert to an alternative solution.

The project offers no safety improvements for either Inverness or Sumburgh. The benefits at Kirkwall, Dundee and Stornoway are solely through the implementation of radar which can be implemented locally. Wick and Benbecula will see a reduction in safety (see below).

Prospect has published a report looking into the procurement and governance aspects of the project <u>link</u>.

The report shows that HIAL has learned none of the lessons of previous failed digital capital projects. There is significant optimism bias and total opposition from key stake holder groups. By using cutting edge technology, particularly multisite control which is untried in UK airspace and only has limited worldwide deployment, HIAL is exposing itself to unnecessary risk and cost.

HIAL has a very poor track record of successfully implementing technological and people change projects on time and on budget - there is no reason to think that this project will differ given the technological complexity.

HIAL has repeatedly claimed, without any credible evidence, that local implementation is not an option. Local implementation of surveillance is the industry norm in the UK. While there are some projects in their infancy moving to digital technology, they are still, with one exception, local implementations. HIAL's resistance to considering this option is not driven by the interests of HIAL users but rather stubbornness on the part of the Board.

HIAL are committed to the policy of the Scottish Government to have no compulsory redundancies. There is no reason to think that this will not remain the policy of the Scottish Government for the duration of this project but it will be extremely difficult if not impossible to reconcile the project as currently envisioned with this commitment.

Staff cannot be compelled to relocate and for most assistants and all controllers there is no suitable alternative work available at the airports due to the specialism and salaries of air traffic staff. This would mean that any staff who refuse to relocate will either be made redundant, breaking the redundancy guarantee, or will be paid to sit at home on full salary. HIAL are working up a relocation offer but Prospect is aware from a survey conducted of members that regardless of the package some staff will not relocate due to their connection with local communities. It is difficult to see therefore how compulsory redundancies can be avoided.

HIAL is currently finishing its Islands Impact Assessment. Prospect's response can be found here.

In summary, Prospect believes that in accordance with the Islands Act Scotland local implementation of surveillance achieves the same policy goals while protecting local economies and maintaining local employment therefore HIAL should reconsider its plans. We do not see any reasonable mitigation which can be put in place to sufficiently make up for the loss of these roles from the local economies of the various airports.

As part of the ATMS project HIAL is downgrading the service at both Benbecula and Wick. This is clearly a reduction in both safety and service to those airports and will hamper the effort of local councils to try and bring new investment into ailing local economies which are already facing a drain of both jobs and population. As a public body HIAL should be giving consideration to these wider concerns but only consulted local authorities after already taking the decision to downgrade the airport. In summary we support the petitioners and believe that HIAL should pause the project to conduct a genuinely independent review of the project considering the requirements of the business, as well as its responsibilities to local communities and economies, and wider Scottish Government policy with regards to protecting employment.

## **About Prospect**

Prospect is a national trade union representing 151,000 members across all sectors of the economy. We are the main trade union for air traffic controllers and other air traffic staff representing more than 3,000 members across the sector. We are involved through the ITF in the development of air traffic policy at EASA and meet regularly with the UK government and the Civil Aviation Authority (CAA) on aviation issues. Prospect through our members has an in-depth and wide-ranging expertise in all aspects of Air Traffic Services (ATS) which we call on to develop evidence-based policy positions on a wide range of ATS issues including both the technical and human aspects of remote towers.

Within HIAL Prospect is the largest trade union in terms of overall membership. Prospect also represents the majority of ATS staff with a total membership density of at least 80% with members at all levels of the ATS structure including headquarters managers, operational controllers, assistants and FISOs.