

The Rt Hon. Grant Shapps MP
Secretary of State
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

Baroness Ruby McGregor-Smith
Chair
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23 March 2020

Dear Secretary of State,

Support measures for aviation

The measures introduced by Government so far to support businesses through the coronavirus pandemic are very welcome and following a discussion with the AOA Board earlier today I am writing to offer some suggestions as to how they could be refined further to help address the issues the aviation sector is facing.

- **Financial support for aviation** - Naturally our overriding urgent priority remains to see Government's proposals for a financial support package for aviation which, as we outlined in our previous letters, we hope will incorporate both measures to protect businesses from breaching financial performance based banking covenants and the urgent need for liquidity support and cost relief via deferral of payments of tax. We hope to see details of this within the next couple of days.
- **Employee support** - the package announced last Friday is welcome and will provide valuable support where workers currently are not needed. However, members highlighted that in its current form, the scheme incentivises businesses to lay staff off rather than to try to continue operating with those staff on reduced hours or reduced pay (for which the scheme currently offers no support). Airports provide a number of services which, despite current difficulties, remain important to the UK economy or to UK citizens (see Appendix) but which require key staff to be "at work". AOA believes the current support package should be expanded to ensure that those staff needed in order to provide such services are not in a less favourable position (financially) than those staff who can more easily be stood down.
- **Regulatory alleviations** - In the aviation context, it is vital that there is flexibility from Government and the Civil Aviation Authority over certain compliance requirements to allow businesses to take the right decisions: i.e. either to keep people in employment (as skeleton staff); or furlough them but be able to bring them back in a sensible way and reasonable timescale once the COVID-19 pandemic recedes. A decision to furlough staff or to ask them to work reduced hours, would have consequences for crucial airport workers' ability to retain regulatory compliance. This applies in particular to staff working in the areas of aviation security, air traffic control (ATC) and Rescue and Fire Fighting Services (RFFS). Staff working in these highly regulated areas have a number of compliance requirements, ranging from working a minimum number of hours over a period of time, on-the-job training requirements as well as refresher training requirements after a period of absence (see Appendix). Without

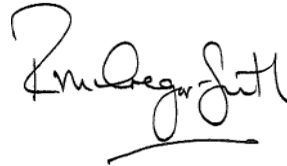
flexibility, the recovery and reopening of services after downscaling or closure could be prolonged and hamper the UK recovery.

Finally, members have raised some concerns about the powers contained within the Coronavirus Bill currently in Parliament as they relate to airports. In particular we would welcome some further clarity about the circumstances under which these powers would be used.

Yours sincerely,



Karen Dee
Chief Executive
Airport Operators Association



Baroness Ruby McGregor-Smith
Chair
Airport Operators Association

- *CC The Rt Hon. Rishi Sunak, Chancellor of the Exchequer*
- *CC Kelly Tolhurst MP, Aviation Minister*

Appendix

Employee support scheme

The package in its current form encourages the furloughing of staff and this could then lead to the scaling down or closure of airports to a range of services. This would have major consequences for people, business and communities relying on their airports, including:

- Lifeline services to remote communities, including in the Highlands & Islands, Isles of Scilly and the UK Crown Dependencies
- Freight services – full freight services have seen an increase to compensate for the reduction in belly-hold capacity with passenger flights grounded
- Emergency landings and diversions
- Medical flights
- Search and Rescue Operations and Training
- Offshore Oil, Gas and Wind Operations
- Military Training
- Lower Airspace Radar Services (LARS)

Maintaining these operations, even at a reduced level, requires a skeleton staff. With close to no income for airports in the absence of passengers and regular scheduled flights, a significant number of airports will struggle to maintain a skeleton staff without the financial and liquidity response industry has called for. A skeleton staff would not only require operational leads, but also those staff that deal with airports' environmental regulatory compliance, senior management, engineers, etc. Together, these constitute a significant wage bill.

In light of this, we would welcome an airport-specific scheme for supporting employment costs to ensure airports can stay open or for the current scheme to be amended to allow staff to work a certain number of hours to a) maintain regulatory compliance (see also below) and b) continue to provide the vital services their local areas requires.

Regulatory alleviations

Air traffic control (ATC)

All air traffic controllers (ATCOs) have a requirement to remain “current” on a monthly basis in providing an ATC service in airport towers, including a minimum number of hours for each to achieve. This is supported by regular checks and additional training to maintain currency (licensing). Currency requirements are specified in a centrally managed assurance scheme approved by the CAA.

Where a controller does not maintain currency for a short period of time the tower unit can support the ATCO to regain currency in a short period of time using On the Job Training Instructors (OJTIs), who are licensed to conduct Unit specific training on other ATCOs at the same unit.

Should an Airport close for a period of weeks or greater, then all of the ATCOs are likely to lose currency including the Unit OJTIs. In this event, when an airport wished to re-open, a period of re-training would be required for all staff to allow them to re-start providing an ATC service. The period of re-training would be dependent on the length of time an airport had been closed and would require approval from the CAA, including the requirement for a CAA Inspector to conduct Unit Validation boards on the

ATCOs concerned. The period of retraining would also depend on the number of staff working at the Unit, the complexity of the Operation at that Unit, and how many other Units are also undergoing the same period of retraining.

If an airport were to remain closed for the longer term then the revalidation process will also need to encompass annual licensing requirements like ATCO refresher training, thereby extending the time it would take to re-start the provision of Service

Rescue & Fire Fighting Services

The situation varies between airports, depending on local Maintenance of Competence schemes (MOCs). These can include periodic revalidation, under varying conditions. Most MOC trackers provide a Red, Amber and Green to denote where the various competencies sit. Airports' MOC policies will also have a statement covering long periods of absence and it is here that their RFFS will need to reflect. Where there are periodic validations, these need to be considered when planning how the RFFS teams can keep themselves competent, while working reduced hours or being furloughed, such that when normal operations resume, they are 'ready to go'.

Each MOC is different and they are further complicated by the different watches (or shift patterns) operated by the airport, meaning staff cannot all be away for revalidation. This means it maybe several days to weeks before the local RFFS can be prepared to officially offer the fire cover that it needs for its chosen category of airport.

Lastly, RFFS staff have to train off-airport every six months, which would be impossible due to Government travel restrictions and increased risk to those travelling. This should be extended during the pandemic. RFFS staff will continue to train on station and aerodrome in elements of breathing apparatus and response exercises until such time advice on travel is relaxed.

Security

For security staff, there is a requirement that after an absence of up to three months this can be remedied by On The Job Training; after an absence of up to six months, formal recurrent training has to take place and after an absence of more than six months full training has to be undertaken. In light of capacity challenge for training provision, this could be a significant bottle neck to scaling up security staff at the security check points. Alternative measures could include allowing security officers that currently screen in central search and HBS to take the NXCT Cargo Competency Exams and screen in cargo after OJT assessment. In the event of closure, there could be an alleviation in place to complete GSO competency assessments rather than attending a refresher course or similar measures