



## **Prospect response to island impact assessment on HIAL remote towers project**

Prospect welcomes the opportunity to respond to the island impact assessment on behalf of members in HIAL. 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 3000 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 CAA on aviation issues. Prospect through our members has an in-depth and wide-ranging expertise in all aspects of Air Traffic Services 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 we are the largest trade union both in terms of overall membership and also the largest trade union for ATS staff. Prospect 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.

Prospect intends to publish this response to members and to the public we, therefore, have no issue with being identified within the report.

Prospect has been campaigning for more than a decade for HIAL to upgrade and repair its air traffic infrastructure. We have also warned of a lack of resilience in the staffing structure for a similar period due to historic understaffing and delays in recruitment. We have been supportive of HIAL's efforts to recruit staff from, or with ties to, local communities and this approach has by and large worked with only Stornoway and Wick seeing a significant turnover of staff prior to the announcement of remote towers. Dundee, Sumburgh, Benbecula and Kirkwall have had largely stable workforces with posts filled in a manageable way. During the same period, Inverness has seen significant turnover in staff. In both the case of Inverness and Stornoway we believe turnover is related to internal factors within HIAL in addition to market forces. HIAL, as the only remaining public sector ANSP struggled to pay competitive salaries before the current crisis however the appeal of an island life did to some degree compensate for that. In 2013 – just prior to an awareness of digital remote towers – HIAL proved that local recruitment was relatively easy and hugely successful. HIAL recruited one ATCO for each of their “rural” airports from the local communities.

Every single one of those is still in post with HIAL, and many have even been promoted. Even before then, nearly every Air Traffic Controller recruited to the airport from the local community has stayed in that post, and been a tremendous investment. This proves that local

recruitment can and does work we, therefore, refute that moving to a centralised service in Inverness will aid work force resilience.

Nationally Prospect is not opposed to the concept of remote towers however we do not agree it is the right approach for HIAL. Within HIAL there is an already established tower and ATC infrastructure which we believe can and should be upgraded rather than seeking to replace it with an entirely new centralised service. It is widely agreed within the industry that remote tower centres will operate to similar if not identical standards with regards training, authorisation and working hours (STRATCOH) we therefore do not see that there is any automatic efficiency or cost-saving benefits in moving to a central service in terms of staffing levels. Any savings from non-staff costs are questionable due to the complexity of the system and even if the savings exist it will take a long time to recoup given the much higher upfront capital costs of the central project. We see the main value of any possible remote towers as being a way of implementing ATC at aerodromes without an ATC service.

This would improve service and safety compared to the status quo. Had HIAL proposed upgrading the service at Islay, Tiree, Campbeltown and Barra rather than changing the service at the other airports they would have had Prospect support. Instead, the solution being proposed by HIAL unarguably reduces the service and safety provision at Benbecula and Wick this should not be acceptable to HIAL or to its users. The project provides no service or safety benefits at Sumburgh and Inverness and the benefits for Dundee, Kirkwall and Stornoway are solely through the deployment of surveillance technology which can be better realised by deploying digital towers locally. Centralisation in and of itself offers no benefits compared to either the status quo or local deployment. On-site digital towers are being rolled out across the county with projects at Cranfield and Lossiemouth better described in this manner rather than the remote tower solution HIAL is proposing. The proposed remoting of London city is also not comparable as it will remain a single-mode operation rather than the multi validation being proposed by HIAL. There remains no comparable projects in the UK and very little in terms of international comparison when considering the number of airports HIAL intends to remote.

HIAL has delayed this consultation repeatedly. It is the view of Prospect members that the project should have been put on hold until this assessment had taken place. On the 23rd January 2020 as part of a members' business debate in the Scottish Parliament the Cabinet Secretary for Transport, Infrastructure and Connectivity Michael Matheson confirmed that a full island impact assessment would take place. During the debate HIAL's plan were criticised by MSPs from all parties and from all communities across the Highlands, Islands and Dundee.

The tone and content of the debate made it clear that MSPs expected a full and proper assessment of all of the options from HIAL as part of the island impact assessment, that HIAL's Managing Director has ruled this out prior to completing the assessment is unacceptable and potentially renders the whole assessment invalid.

It is Prospect's understanding based on discussion with the island team that all options for implementing the policy's aims should be considered on an impartial basis including alternative approaches to implementation. The example given here as to the possible alternatives would have the support of staff and local communities but has been presented by

HIAL as unworkable and expensive however the numbers given by HIAL to discredit this option do not stand up to even cursory scrutiny.

It is undeniable that throughout the project HIAL has briefed staff and local communities however this has always been after decisions have already been taken rather than involving the staff and local communities in the process. The major announcements made at the start of this year with regards to project timescales and the decision to downgrade Benbecula and Wick are sadly typical of the project's approach to engagement. These decisions were taken by the HIAL board without consulting staff, their representatives or local communities. While HIAL has argued that they are not required to undertake this island impact assessment as the decision to undertake the remote towers project predates the legislation this cannot be said for the decision to downgrade Wick and Benbecula.

The Island Act requires consultation on a service change specifically:

#### 16 Duty to consult island communities

(1) The Scottish Ministers must consult island communities before making a material change to any—

(a) policy,

(b) strategy, or

(c) service,

which, in the Scottish Ministers' opinion, is likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities) in Scotland.

(2) The persons consulted under subsection (1)—

(a) must include each local authority listed in the schedule, and

(b) may include such other bodies or persons as the Scottish Ministers determine.

This requirement has not been met. Instead, rather than engaging in meaningful consultation HIAL has sought to explain their decision after the fact. The island impact consultation might have given effect to this requirement but the covering note from the Managing Director has made it clear that HIAL does not intend to revise their plan regardless of the views of the community. HIAL are now seeking to engage with staff on lower-level policy issues however it is not sufficient for HIAL to promise to do better in the future having failed to consult in the past. The project should be paused while these key strategic decisions are reviewed in light of feedback from staff and communities gained from this exercise.

Prospect surveyed its HIAL ATS members in 2018 on their view of this project. While they were supportive of HIAL's overall object of modernising ATC they were, and remain, vehemently opposed to the centralisation aspect of the project this is both on an operational level and on a

personal level due to the disruption to their lives and their families.

The motivation here is not financial. It is well understood by members that if they move to Inverness and complete their radar tickets they will be paid a higher salary. It is also understood that relocation support will be offered, this has already been provided to staff that have transferred to the project. Despite all of these pull factors the view of the majority of members remains that they will not relocate due to their connection to the local community. It is incredibly difficult to progress a project of this scale without staff buy-in. Efforts to engage staff have been unsuccessful as they have failed to address the twin concerns of staff both about the operational model and the centralisation aspect.

In the current operation of out of hours cover for emergency, flights are delivered through a rota of FISO's on an on-call basis. The exact details vary from station to station but this is staffed by a mixture of assistants and other staff holding a FISO licence, often firefighters. Where FISO cover is not available an air traffic controller covers the shift however this is not preferred due to the STRATOCH rules which apply to controllers which includes provision for rest after periods of night-time working. This system works well and delivers an information service for emergency and ambulance flights as required. There is no requirement or demand for this service to upgrade and it is viewed as proportional to the requirement.

As noted in the paper the loss of FISO payments has not been considered. These payments should be considered. For those who undertake FISO on-call duties, the payment makes up a significant addition to their income. For this payment they have at the request of the company learned additional skills and taken on significant additional responsibilities, under HIALs plans this would all be disregarded. The FISO payments are a further loss to the local economy there is also an, as yet unquantified risk that staff in receipt of the payments may seek alternative employment due to the loss of income.

Inverness has night time traffic and has a single controller night shift offering a procedural and approach service. This is delivered by one ATCO each night. Even with this flight Inverness is only H20 it is therefore difficult to see where a requirement for 24 hour ATC surveillance has arisen.

In the new operation, HIAL intends to provide an out of hours service by providing a full night shift of 7 including ATCO's, Assistants and supervisors. The cost of this is an order of magnitude higher than the current service provision while not actually being required. A localised approach would allow HIAL to continue to tailor out of hours provision to user requirements minimise costs and maintain local employment.

If there is a genuine requirement for surveillance overnight, which we question, then this can be delivered as it is at Aberdeen and Edinburgh using RIIT technology with a far lower number of staff than are currently being estimated in this document.

Unit	Current operational compliment	CAP 670 (inc surveillance position)	Quoted figure in D.3	Overestimate
Kirkwall	11	16	27	11
Sumburgh	9.5	17	27	10
Stronoway	11	19	27	8
Dundee	10	18	27	9
Inverness	20	21	27	6

As you can see from the above table there is a significant disparity between what has been presented in section D3 of the document and the required staffing level. Even if the requirement was to provide an Inverness like service at each site it still appears to be a significant overestimate. Taking this into account our estimate is that the staffing cost is comparable to the figure given for the remote tower centre. If these figures have been used as part of a decision making process it calls into question the level of scrutiny being given to the project by managers as they are clearly not credible. Inverness has significantly longer opening hours than the other stations so to assume that the staffing requirement at each station are the same as Inverness is deeply flawed.

The table presented in the consultation shows that HIAL are not serious about considering alternatives. The figures quoted are utterly unrealistic and have been presented as a straw man to justify centralisation. A genuine independent review is required to ensure that all options including continuing dispersed operation are considered.

Section D2 sets out the proposed staffing cost for the remote tower centre. This clearly demonstrates that the project is disproportionately affecting mainland locations to the benefit of Inverness. The staffing figure and therefore costs quoted for the centre are unvalidated. HIAL is intending to have staff validate at multiple aerodromes in an effort to reduce costs. This approach is contentious and is almost unheard of within UK ANSPs.

Currently, only one other ANSP in the UK has staff with dual aerodrome validations, Liverpool, and they are not required to control different aerodromes on the same shift. There are significant human factor challenges to multiple aerodrome validations and there is no guarantee controllers will be able to validate at aerodromes other than those that they have

transferred from (if they choose to transfer at all). If multi aerodrome validations cannot be agreed the staffing level would need to be the same as in the dispersed model.

Therefore the company's assertion that the new model is cheaper in the long term due to staffing efficiencies is suspect. While controls can be put in place to limit the human factor risks of multi aerodrome validations the risks cannot be entirely eliminated.

Far from struggling to recruit controllers to island locations before the announcement of remote towers, HIAL had been successful at recruiting and retaining staff at remote stations despite offering uncompetitive salaries. With the agreement of Prospect HIAL had been working to recruit and train controllers with links to island communities. This approach has worked at Benbecula, Kirkwall and Sumburgh. Following issues at Stornoway recruitment had been undertaken and the unit is back to full strength. The issues at the station were related to management and culture which are being addressed separately.

It is worth noting that in 2019 there was an extended period of industrial action including work to rule in a dispute relating to pay. This explains the extension refusal in 2019. There is no reason to think that a centralised service would be any less vulnerable to work to rule or strike action in the event of any future dispute. If anything it is likely to be more vulnerable to coordinated industrial action it is therefore not reasonable to include this data within the rationale for change. It is also notable from the data that Inverness has had significant closures. These closures have been due to recruitment and retention problems in Inverness. There is no reason to assume that their problems will not be replicated in the remote towers centre.

The lead-in time for controllers in the new centre is likely to be the same or higher than the current lead-in time. The main time constraints are time at college and time to complete local validations. Those validations are normally determined by traffic levels which are not anticipated to change. The centre does not address issues with lead times in any meaningful way. While on the face of it a larger pool of staff should be more resilient as there are likely limits to the number of validations any staff member can hold, the operation will remain as vulnerable as it is now to staff resignations. Indeed the higher rate of turnover at Inverness and the breaking of the links to the local community may mean that the operation becomes less resilient than the current operation and certainly less resilient than the dispersed model.

Prospect does not dispute the safety benefits that surveillance technology can bring however we see little or no evidence that a centralised remote facility offers any safety benefits over the delivery of surveillance in local settings. From both resilience and a human factor perspective, local delivery remains the safest option.

While there are possible environmental benefits in using different climb and descent profiles these are dependent on surveillance, not remoting and centralising and could be achieved through local implementation. Conversely, relocations and/or commuting in addition to the significant construction work required to build and outfit the centre and connections have a significant environmental impact. Local implementation remains the best solution on

environmental grounds.

It is difficult if not impossible to maintain all six runways at Sumburgh in remote operation. By removing some of the runways there is an impact on the fuel economy and allowances for aircraft. It is likely to require further fuel expenditure. There is also a significant risk that pilots will have to carry more fuel as a resilience measure to hedge against all HIAL airports going dark simultaneously, this would mean that pilots flying from Shetland would need either Aberdeen or Norway as an alternative rather than Kirkwall or Wick.

While there is significant uncertainty on the UK relationship with the EU at the time of writing it is likely that the UK will have rules on state aid in some form with rules either emerging from London or Brussel. Current state aid rules prevent organisations in receipt of public subsidy from bidding for commercial work against private companies.

It is unlikely that HIAL will ever be able to function without subsidy due to the level of flights at the smaller airports HIAL could seriously tender for work currently undertaken by private ANSPs

The alternative proposal would with limited work deliver the goals of the remote towers project while maintaining local employment. It enjoys the support of both the staff and communities served by HIAL and as set out above remains the safest, cheapest and easiest way to deliver the policy objectives. It also minimises the impact on local economies and requires no mitigations under the island act. HIAL should take the opportunity afforded by this consultation to pause the project and review in a genuinely independent manner the options available to them taking into account that the regulatory and legal environment has changed since the original decision was taken.

Prospect members had hoped that HIAL would use this consultation as a serious opportunity to review the project. They had hoped that HIAL would finally listen to their staff and users.

It is the view of Prospect members that the downgrading of both Wick and Benbecula is both unnecessary and unsafe and has been taken for commercial reasons rather than considering the safety of the travelling public and the good of island communities.

Before taking the decision the HIAL board did not consult with either staff or communities. After the board met there was no attempt to meaningfully consult staff. Instead, they were told that this was happening and that they should reconcile themselves to it. The staff at both locations are experts in the operations of their specific aerodromes and to not include them in any discussions about traffic levels or requirements is frankly dangerous. The situational awareness tool being proposed by HIAL goes significantly beyond what would not normally be expected of a FISO. If it is a requirement then there is a clear need to maintain a higher level of service. The awareness tool was trialled by ATCO's at Dundee with very limited success, the trial was ended and the system was not implemented due to persistent issues. Even if the issues that Dundee suffered were to be resolved a FISO cannot offer a Deconfliction Service, it

is beyond their licence. There is no “FISO +” licence within UK regulations which is what HIAL are currently planning.

Both Wick and Benbecula have helicopter and non-scheduled operations they remain complex airspaces to manage even if scheduled traffic is low. Staff do not accept that their aerospace is low complexity and analogous to Islay, Tiree, Barra and Campbeltown.

The CAA has made it clear to Prospect that flexible controlled airspace would be granted to both Wick and Benbecula if it was requested. There would be limits on the time of operation and the distance but this would not be a barrier to offering a control service at these aerodromes.

There is a clear loss of employment to the island economy and a reduction in service to users of the airport. Once removed bringing back an ATC service is significantly more work than maintaining a service already in place. The Scottish Government continues to have aspirations for Benbecula and Wick to have involvement in the UK space programme with Caithness a possible vertical launch site and Benbecula as a possible horizontal launch site. There are also aspirations to make Benbecula a hub for clean flight technology; this will not be possible if the aerodrome is downgraded. While Loganair are happy to fly to FISO only aerodromes this is not a view shared by most other operators and would likely limit the access to new or other airlines.

While a FISO centre of excellence will provide some employment both the number of roles and salaries will be significantly below the current service provision.

### **Impact by Airport**

Sumburgh - The service being proposed at Sumburgh is the same level of service that is currently offered therefore ATMS offers no benefits at all to Shetland as a whole or to Sumburgh specifically but a heavy disbenefit with loss of high-quality employment from the community.

Inverness - No benefit in terms of service provision. A clear increase in local employment however the local economy is currently very buoyant with local services already struggling and the housing market stretched.

Kirkwall, Stornoway - While surveillance will offer a service benefit this could be delivered locally using the current infrastructure using RIIT while maintaining the current staff complement. The project has several disbenefits as with Shetland.

Dundee – As Kirkwall and Stornoway but with no requirements for an out of hours service due to noise restrictions around the airport.

Wick and Benbecula- No benefits. Significant reduction in services as well as the impact as described for Shetland. Particularly acute in these locations as the local economy is already shrinking.

In summary Prospect’s view is that the ATMS offers no benefits which cannot be realised in a manner that is safer, cheaper and more easily achieved by local implementation. HIAL’s assumption that a central service is cheaper and more resilient does not stand up to scrutiny.



By pursuing a centralised strategy they are causing significant damage to local economies which can only be mitigated by pausing the project and reviewing the whole strategic direction. There are no mitigations that HIAL can offer which will reduce this damage.

Offering relocation or redundancy does not mitigate the damage to local economies. While some members, particularly those close to retirement may choose to take voluntary redundancy the size of the local economy is still reduced. Commuting is not a sustainable option due to tax code rules in addition to safety concerns about significant travel prior to and post ATC shifts.

Prospect will consider its position after this review assessment is concluded. If we do not believe that HIAL have given proper consideration to the views of staff and communities we will consider if we see any benefit in any way associating ourselves with this project. We will also consult members on the next steps which may include industrial action.

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