Project Palamon:
Progress Update - August 2023

21 August 2023

NATS

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Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)[1], and as recommended by the CAA, we committed to provide six-monthly updates on the actions being progressed to address the seven recommendations set out in the Final Decision. This is the fourth update to the CAA.

Summary of Progress

In its formal response to the CAA (August 2021), NERL committed to increase staffing resilience of services within the London Terminal Manoeuvring Area (TMA), by increasing both the headcount and number of validations held by controllers and to identify ways to deploy them in a more flexible manner and to train them more efficiently; this update sets out the good progress that has been made in these areas. NERL has also provided an updated staffing resilience plan (January 2023) including an updated view of supply and demand.

Our training programme has delivered an increase in controllers and validations, with controller headcount now c.8% higher than summer 2019. We have also seen improvements in training efficiencies and in standardising and simplifying procedures for operating the Approach functions.

In line with our response to the CAA NR23 Provisional Decision[2] relating to coding of air traffic control delay, we will propose and consult on the additional reporting in the quarterly Condition 11 report as part of the Service Standards Statement Consultation for 2024 onwards.

Our commitment to engage effectively with customers continues. NERL is now reporting service performance outcomes on a quarterly basis, including performance against the Oberon indicators. NERL has made good progress on the accepted recommendations as detailed below.

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[1] CAA, Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, 25th February 2021
[2] NERL response to CAA NR23 Provisional Decision, CAP2553 (4 August 2023)

Update on the Recommendations

1   Staffing Resilience

Our training programme continues to deliver both new controllers and additional validations into Terminal Control (TC) Approach. As of the end of July 2023, the number of validations supporting the approach control functions of the London airports (compared to summer 2019) were: Heathrow 44 (43), Gatwick 38 (30), Stansted 38 (26), Luton 32 (24) and London City 28 (31). These validations are held across 123 controllers, a c.8% increase from summer 2019.

We have continued to develop initiatives under the themes of training efficiency and flexible deployment of resource. The sections below outline key progress since our last update.

Training efficiency

Training is ongoing for the initial cohort jointly training for initial validations on both Stansted and Luton, following the successful implementation in February 2022 of the AD6 airspace change. The benefits targeted by this changed approach were outlined in previous updates. This initial cohort are forecast to achieve their initial validations in Q3/Q4 2023. Feedback received from trainees and the operational teams will be used to modify the approach to the delivery of future Unit Endorsement Courses (UECs) for Stansted and Luton (earliest opportunity currently early 2024) to ensure we maximise the potential of this approach.

The training phases which prepare and transition students from initial training to "on-the-job" training in the live environment have been redesigned and began roll out in AC in April 2023, with TC coming later in the year. This is part of our training transformation programme across NERL, which is targeting, among its objectives, reduced durations and increased success rates. As noted in previous updates, as part of our NR23 business plan, this programme incorporates requirements for investment in training and simulator capability to reduce dependency on the live environment. We are pleased to note that the CAA, in its NR23 Provisional Decision, allowed capex in line with NERL's updated capex plan for NR23, including the ATC Training Transformation investment programme.

Discussions with the CAA and the Department for Transport on the recognition of non-UK licences and training have begun with NATS putting forward a proposal. This is currently being reviewed by the CAA and further conversations are planned to enable recruitment of experienced ATCOs from outside the UK. In addition, NATS has been running a programme of recruitment of formerly UK valid ATCOs who qualify for a UK licence. This includes both ATCOs who left NATS for other roles in the UK, and those who left the UK to control overseas. Our Training team has established a process for assessing the previous competence (APC) of previously valid UK ATCOs and preparing them for unit training.

Flexible Deployment of Resource: Standardisation of Procedures

Work has continued to standardise and simplify the procedures for operating the Approach functions. This had been identified as beneficial for enabling controllers to train for additional sector validations more easily. Notable progress since our last update is detailed below.

Following our initial internal review of Stansted's procedures, our findings were shared with the tower controllers team. A meeting took place in March 2023 where joint wording was agreed where possible and areas identified that would require further investigation. Fortnightly follow-ups to progress this work have faced resourcing challenges. As such, NERL has taken the action to provide draft versions of revised wording to Stansted to make editing and aligning less labour-intensive for those at the tower and allow us to use our joint time more efficiently.

As noted in our previous update, a significant area of alignment has concerned the handling of Visual Flight Rules (VFR) crossing traffic which has varied across the different units and had been identified by our training teams as one of the most challenging aspects of cross-training the approach sectors. Procedures established which are proven to work well at Gatwick are currently undergoing an evaluation at Luton and Stansted. Luton's evaluation has been running since November 2022 and has received positive feedback. It has been extended to cover the summer months and is due to be made permanent at the end of September 2023. Stansted's evaluation is currently underway and is due for completion mid-October 2023 and expected to be made permanent later this year.

Flexible Deployment of Resource: Operational staff deployment

A portfolio of activities continues to be prioritised across the business to provide further mitigation for both supply and demand side risk in the coming years across the NERL operation. These have been split between activities and initiatives for summer 2023 and those targeting delivering benefit throughout the remainder of the NR23 period.

For summer 2023, steps were taken to ensure that the operation remains able to deliver to its commitments including the service performance targets. These included but were not limited to:

- removal of non-operational activity from peak periods where possible
- non-operational ATCOs who hold operational skills offering double the number of operational shifts required to maintain their validations
- reduction in night shift coverage on some sectors to enable increased day resilience
- return of some flexible workers with time-limited contracts to full time during the peak
- external recruitment of ATCOs, some becoming valid this summer.

As well as further refining and embedding some of these initiatives, a number of longer-term mitigations, which we have previously shared in our Palamon update reports, continue to be explored:

- changing the way that we deploy operational staff both into the operation and to service non-operational activities, to make our supply more agile to meet fluctuations in both sources of demand
- additional external recruitment of experienced controllers to supplement the recruitment and training of new controllers
- further transformation of the ATCO training process designed to deliver new ATCOs into the operation faster and with improved success rates
- how we can better support retention by providing greater flexibility to those ATCOs who are considering their transition to retirement, such as through reduced night shifts and flexible working options including moves to non-operational activities.

Several of these mitigations will require detailed engagement with the Prospect union - this is underway. As material benefits are realised for the resilience of our operational ATCO workforce, we will report on progress through these updates.

2. Airspace Change

Given the reduction in delay seen in the TC Essex region since the implementation of the AD6 airspace change, and the existence of the Future Airspace Strategy Implementation programme and its oversight by the CAA and DfT, this recommendation was closed in the last report. This does not mean we will stop considering this airspace for development, but reflects the 'business as usual' processes in place that regularly review all parts of our airspace.

The AD6 Post Implementation Review submission is planned to be delivered to the CAA in early 2024, with its decision on the Review expected approximately three months later.

3. Engagement with Stakeholders

On the strength of the results from our annual customer survey, the successful re-starting of our face to face Operational Partnership Agreement (OPA) and Airspace & Flight Efficiency Partnership (AFEP) meetings in March 2023, and in the knowledge that we have regular processes for reviewing and improving our customer engagement, we closed this recommendation in the last report.

4. Coding of Air Traffic Control Delay

NERL is not unwilling to provide delay transparency. The J and K codes proposed by the PRC have yet to be adopted by Eurocontrol Network Manager. The current codes and process documented in the ATFCM Operations Manual are automated from tactical operational application of regulations through to the post-operational reporting systems. The PRC trial required a manual post-operational process to categorise the delay independently from Eurocontrol Network Manager processes.

NERL will continue to follow the current requirements within the Eurocontrol ATFCM Operations Manual until such a time when the new codes may be incorporated into the document and communicated to ANSPs with guidance on the consistent application in both the tactical and post-operational analysis phases.

To address the post-operational delay reporting, NERL agrees to propose and consult on additional reporting into the Quarterly Condition 11 Report as part of the Service Standards Statement Consultation for 2024 onwards.

5. Sector information to Eurocontrol

NERL continues to meet the objective of this recommendation. NERL provides the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

We have recently established a high-level Business to Business (B2B) connection with Eurocontrol to receive data from the Network Manager. This is the first step towards being able to exchange data with NM and provide dynamic sector opening information in line with the iNM digital transformation programme over the coming years.

No further progress on this recommendation since the previous update.

6. Performance Data

Closed in Update 2 – August 2022.

7. Reporting on Resilience Planning

This fourth issue of our six-monthly reports meets part of the CAA's recommendation 7, to report on progress in maintaining a resilient service through adequate supply of operational staff across our network, as well as on steps to enhance airspace capacity and to engage more effectively with airline customers and airports on operational performance. We meet other parts of the recommendation in the updated staffing resilience plan, produced on an annual cycle, and most recently issued in January 2023.[3]

In addition to this reporting, we engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27, and subsequently on our evolving investment portfolio via the six-monthly Service and Investment Plan (SIP) consultation, with progress reports in the intervening quarters. This includes presenting evidence on the projected range of demand for en route service, versus the projected range of supply, as well as implications of traffic levels and the scale and pace of capital investment for service outcomes (in terms of delay and flight path efficiency).

The list below shows, in chronological order, where we have shared and discussed our staffing plans with customers since the issue of the Palamon Decision in February 2021:

  i.   Palamon Decision Response (August 2021)
  ii. NR23 business plan prospectus and consultation (Autumn 2021)
  iii. Staff Resilience Plan Issue 1 (January 2022)
  iv. Palamon Update #1 (February 2022)

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[3] NATS (January 2023), ATC Staffing Resilience Plan

v.   NR23 Business plan submission (February 2022)
   vi.   Palamon Update #2 (August 2022)
   vii.   NERL response to CAA's Initial Proposals for NR23 (December 2022)
   viii.   Staff Resilience Plan Issue 2 (end January 2023)
   ix.   Palamon update #3 (February 2023)
   x.   NERL Condition 5 Certificate 2R 2023 (June 2023).

Over the last two years, much of the consultation on staffing has been through the NR23 process, and as that process is drawing to a conclusion, we will consider how and where it is best to continue that engagement.