Engineer Working Hours -The Future UK SMS CAG Work Programme

Presentation to RAeS Fatigue in Aviation Maintenance Seminar 25th October 2002

> Simon Witts, Chairman UK SMSCAG

#### Background

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- 1998 Issue with Human Factors in E&M
- March 1999 Formation of UK HFCAG
- Success with HF Programme Pack
- Early 2000 UK HFCAG becomes UK SMS CAG
- Late 2001 UK SMSCAG success with input to CAP 712 Safety Management

### **UK SMSCAG Representation**

- Representation from UK industry organisations/ groups/bodies for E&M:
  - AAIB
  - ALAE
  - BHAB
  - CHIRP
  - IFA
  - IMG
  - RAeS
  - UKOTG
  - UKFSC

## **UKSMS CAG** Membership

- Di Moseley, Britannia
- Gareth Cunningham, coopted
- Jim Done, CAA
- Cliff Edwards, Shell Aircraft
- Gerry Evans, Retired
- David Hall, CAA
- Sarah Havard, co-opted
- David Johnson, CHIRP

- John Dunne, Airclaims (Chairman, UKFSC)
- David King/Alan Simmonds, AAIB
- Geoff Ratcliffe, RAeS
- John Saull/Jim Rainbow, IFA
- A N Other, FLS
- Simon Witts, BA CitiExpress (Chairman)

#### UK SMSCAG - Current Status

- HF Programme Pack fed into NPA 12
- CAP 712 Safety Management initial work completed
- UK SMS CAG work being fed into new SMS University Course
- IASS Presentation/Workshop on Safety Management - Dublin, November 2002

#### UK SMS CAG - Current Status

- UK SMS CAG still 'unique'
- Strong cross-group representation
- Group works well together
- Strong link into CAA exists
- Links being re-established with 'member' groups'

#### HF - Agreed Way Forward (February 2002)

- Allow HF work to be dealt with by follow-up to NPA 12
- Continue to liaise with CAA/Industry on development of SMS guidelines
- Look to develop 'Programme Pack' for Engineer Working Hours
- Look to develop 'cross-party' acceptance for the work

# New UKSMSCAG Work Programme

**Engineer Working Hours** 

#### Background

- EU Working Time Directive
- Report to CAA Work Hours of Aircraft Maintenance Personnel
- Safety Management Systems Risk Assessments
- 'Best Practice'

#### **Current Status**

- Solid and voluminous amounts of research available
- Lack of practical guidance available
- Similarity to original situation with:
  - Human Factors
  - Safety Management
- UK SMSCAG suggested a new Programme Pack....

#### **Engineer Working Hours**

A Practical Guide to Implementation in the Workplace

#### Purpose

- To interpret the requirements of the relevant articles of the European Working Time Directive as they apply to the regulation of engineer duty times and the avoidance of fatigue in engineers
  - even though they do not yet <u>formally</u> apply to Engineering

#### Purpose

- The document would be a <u>practical</u> guide to the issues surrounding working hours
- The document would contain 'Anybody's Organisation' Engineer Working Hours (EWH) Guidelines
- The EWH Guidelines could, in future, carry an 'Approval'

#### **EWH** Purpose

- The document aims to set guidelines which ensure engineers are adequately rested at the start of each duty period
- To this end, length of duty periods, periods of time off, and cumulative duty hours will be covered
- The guidelines would apply in relation to any duty carried out at the behest of the company by engineers

#### Draft EWH Document Format

- Purpose
- Responsibilities
- Definitions
- Engineer Duty Period (EDP)
- Additional guidelines on Engineer Duty
- Mixed Duties

- Travelling Time
- Positioning
- Guidance on Maximum Working Hours
- Extension of Working Hours
- Rest Periods

#### **Draft EWH Document Format**

- Reporting of extension to Working Hours
- Cumulative Duty Hours
- Records to be maintained

Appendices:
 Discretion Report

### Engineer Working Hours Guidelines

- The intent of the document is to permit 'Any Organisation' to have predictable manning of its operation
- It also provide would ultimately provide engineers with a stable roster with which to plan their working and domestic lives

### **UK SMS CAG Work Proposal**

- Circulate 'Straw Man':
  - EWH Document
  - Guidelines Agreement
- Gather 'current situation' data from companies we need your input !
- Review Recommendations of CAA sponsored Study
- Complete documents with 'best practice' data

#### **UK SMSCAG Work Plan**

**Engineer Working Hours** 

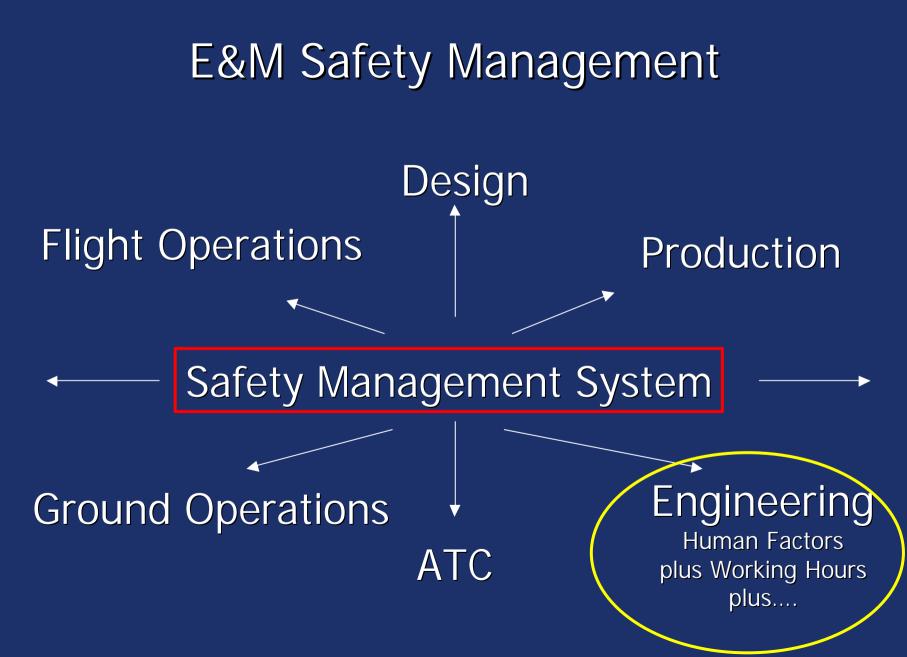
A Practical Guide to Implementation in the Workplace

### UK SMS CAG Work Proposal

- Ensure that Group representation is appropriate
- Draft Guidelines on Engineer Working Hours
- Ensure that they are practical and reflect best practice
- Consult with experts through UK SMSCAG member organisations
- First Draft for comment early 2003

#### **UK SMS CAG Work Proposal**

- Circulate Drafts to CAA/Industry via SMS CAG Representation
- Gather comments
- Update documents and aim to publish in a similar way to HF Programme Pack
- Timescale publish by mid 2003 !
- Integrate subject under SMS umbrella...



#### Design - JAR 21, JAR 25

Design assessed, failure modes and effects evaluated etc.

#### Manufacture - JAR 21

Design implemented, concessions/variations agreed etc.



Testing and Certification - JAR 21, JAR 25

Hazards 'sampled' and Design assumptions verified etc.

In Service - JAR-OPS M; JAR145

Safety Management

#### Summary

- UK SMSCAG working on Engineers
  Working Hours already
- Builds on successful HF and SMS work
- Group has good cross-party representation - membership needs to be re-visited
- We are keen to gather additional support and guidance
- We aim to publish an EWH Programme Pack in mid-2003

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